

Conflict Minerals Compliance Statement

Dodd-Frank Wall Street Reform and Consumer Protection Act — Section 1502

Purpose

This statement describes the position of Minuteman Spring Company, Inc. with respect to conflict minerals as defined under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and associated SEC reporting requirements.

Our Position

Minuteman Spring Company, Inc. is committed to responsible sourcing. We do not knowingly purchase or use conflict minerals — Tin, Tantalum, Tungsten, or Gold (3TG) — that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries.

Our products are precision custom springs and wire forms manufactured entirely in the United States. Our primary raw materials are high-carbon and specialty steel wire sourced from established U.S.-based suppliers.

Primary Wire Suppliers & Their Compliance Documentation

We rely on conflict minerals representations and documentation from our upstream wire suppliers. Our two principal wire suppliers and links to their conflict minerals compliance documents are:

Supplier	Location	Compliance Document
Gibbs Wire & Steel	Multiple U.S. locations	CMC Declaration of Product Compliance gibbswire.com
Industrial Steel & Wire Company	Chicago, Illinois	Conflict Minerals Statement — Dr. Brian K. Furlong, President industeel.com

Both suppliers have confirmed in writing that the wire materials supplied to us do not originate from conflict-affected areas as defined under Section 1502 of the SEC reporting requirements. Individual vendor documentation is maintained on file.

Continuous Improvement

Minuteman Spring will continue to monitor regulatory developments and engage with our suppliers to strengthen conflict minerals due diligence as standards evolve.

Contact

For questions regarding this statement, please contact Minuteman Spring Company, Inc. at **+1 508 299 6100** or visit **minutemansprings.com**.



Authorized Signature

Minuteman Spring Company, Inc.

05/05/2026

Date

Minuteman Spring Company, Inc. | 34 Howe Avenue, Millbury, MA 01527 | +1 508 299 6100 | minutemansprings.com

This document is subject to periodic review and update.