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## Avalanche Technology Conflict Mineral Policy

Avalanche Technology is committed to a strict code of conduct from an ethics and social responsibility perspective while conducting normal business activities. This includes relevant global laws and regulations such as those applying to Conflict Minerals, whereby we strive to meet the highest standards preventing its products from containing applicable materials that originate from any “Covered Country”.

As part of this responsibility, Avalanche Technology will fully comply with the Securities and Exchange Commission (SEC) rules regarding the use of conflict minerals origination from any “Covered Country” as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Wall Street Reform Act) enacted in July 2010.

As currently defined by the SEC, conflict minerals include: Columbite-Tantalite refined to **Tantalum**, Cassiterite refined to **Tin**, Wolframite refined to **Tungsten**, **Gold** and **Cobalt** - TBD.

Avalanche Technology conducts due diligence by working closely with its suppliers to identify the origin, source and chain of custody of the conflict minerals that were necessary to the functionality or production of the products that are manufactured or contracted to manufacture to ascertain whether these conflict minerals originated from a “Covered Country”.

“**Covered Country**” shall mean DRC or an adjoining country (presently Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia).

Avalanche Technology expects its suppliers to have in place due diligence measures in accordance with OECD Guidance or any other nationally or internationally recognized supply chain due diligence standard of equivalent nature ensuring that direct materials, parts, components, sub-assemblies supplied to us are DRC Conflict Free. Based on the foregoing, Avalanche Technology expects that suppliers can reasonably demonstrate that they have exercised due diligence on the source and chain of custody of Conflict Minerals and verify on an ongoing basis as part of a standard audit process.

Avalanche Technology requires that suppliers whose products contain Tantalum, Tin, Gold and Tungsten submit this information to Avalanche technology using the standardized Conflict Minerals Reporting Template (CMRT) issued by the Responsible Minerals Initiative (RMI) that traces the metals back through the supply chain.

Our objective is to have and maintain a conflict-free supply chain. If Avalanche Technology becomes aware of a supplier whose supply chain includes Conflict Minerals which are not “DRC Conflict Free”, we will take the appropriate actions to remedy the situation in a timely manner.

VP of Quality, Avalanche Technology

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#### Revision History

| Revision | Date       | Change Summary          |
|----------|------------|-------------------------|
| REV A    | 20/01/2021 | Conflict Mineral Policy |