



PHOENIX AMERICA LLC.

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FORT WAYNE, IN 46804

March 9, 2021

To Phoenix America, LLC Suppliers and Customers

Subject: Phoenix America, LLC, Conflict Materials Policy Statement

On August 22, 2012 the US Securities and Exchange Commission ("SEC") published final regulations implementing the "conflict minerals" reporting obligations under section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Dodd-Frank Act requires that all publicly traded companies subject to SEC rules report annually on the presence of certain minerals, characterized as conflict minerals, including tin, tantalum, tungsten or gold (3TG), in the products they manufacture or contract to manufacture, and demonstrate the proper level of due diligence in determining whether these minerals originated from the Democratic Republic of the Congo ("DRC") or an adjoining country or from scrap or recycled sources.

For our suppliers:

We are committed to sourcing minerals that are not procured from Conflict-Affected and High-Risk Areas, as well as complying with Section 1502 of the Dodd-Frank Act. As a result, Suppliers to the Phoenix America, LLC, are required to support our efforts in conducting a Reasonable Country of Origin Inquiry (RCOI) and documenting countries of origin for the tin, tantalum, tungsten, and gold that it purchases. We ask our suppliers to undertake due diligence with their supply chains to determine the location from which 3TG is being sourced and whether the smelter or refiner is conflict free. We ask our suppliers to only procure materials from approved (conflict-free, conformant, etc.) sources. Suppliers are expected to maintain policies and procedures that support their due diligence and our expectation that suppliers source responsibly. Suppliers are encouraged to continue support of conflict free smelters and refiners and to take similar measures with their supply chains.

For our Customers:

Phoenix America, LLC (PAL), does not knowingly procure any 3TG that originates from conflict-affected or high-risk areas, unless they are processed by smelters and refiners that are verified or in the process of becoming verified as "conflict free," "conformant" or the equivalent by an independent third party.

Our due diligence processes and efforts are based on the information provided by PAL's suppliers. Information provided by our suppliers is used to inform our risk assessments and risk mitigation activities and in the development of PAL's Conflict Minerals Reporting Template (CMRT), which is available upon request.

If we discover that products procured by us contain 3TG, we will take steps in conjunction with the supplier to transition the products' 3TG supply chain to conflict free sources or to seek to use leverage to influence the smelter or refiner to become conflict free.

Any questions on this policy can be answered through the contact information below.