

CONFLICT MINERALS POLICY

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PRELIMINARY

On August 2012, the United States Securities and Exchange Commission ("SEC") issued its final rules in regards to "Conflict Minerals" (known as '3TG' – Tantalum, Tin, Tungsten, and Gold) as defined in and required under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"). The rationale behind the Conflict Minerals Rule is to deter violence and human rights violation in the Democratic Republic of Congo and adjoining countries by reducing a significant source of funding for armed groups that are committing human rights violation in those countries.

As a result, many companies are now more particular on the existence of Conflict Minerals in their product and if so whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the said Act. In line with that, **SAMURAI 2K AEROSOL SDN. BHD.** strives to procure minerals from credible and conflict-free sources and enforce its commitment against any acts of violence and human rights violations.

This Policy reflects Samurai 2K Aerosol's commitment and its expectations of its product suppliers pursuant to actions to be taken to address Conflict Minerals.

DEFINITION

the term "Conflict Minerals" is referred to 3TG minerals listed above or other minerals as determined by the United States Secretary of State to be financing conflict in Covered Countries;

the term "Covered Countries" includes the above listed countries or any other country determined by the United States Secretary of State from time to time the term "we," "us," "our," the "Company," and "Samurai 2K Aerosol" refers to Samurai 2K Aerosol Sdn. Bhd.



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SAMURAI 2K AEROSOL'S POLICY STATEMENT

We are committed to ensuring the health, safety, and protection of workers who are related to our business supply chain, and therefore, we require high social, environmental, and human rights standards among our suppliers. Fulfilling our obligations in regards to Conflict Minerals is a part of our corporate responsibility and we acknowledge the importance of addressing and mitigating human and environmental related issues.

We are working towards ensuring our products do not contain Conflict Minerals that have been sourced from mines which support or fund conflict within the Democratic Republic of Congo or adjoining countries. Therefore, we are committed to: – Identifying potential products of **SAMURAI 2K AEROSOL SDN BHD** that may contain Conflict Minerals and subsequently target our efforts accordingly – i. Not buying products and materials containing Conflict Minerals directly from Conflict Mines ii. Asking our suppliers to work towards ensuring any products and materials supplied to SAMURAI 2K AEROSOL SDN BHD are Conflict Free Sources iii. Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals. In addition, we are committed to engaging with our customers regarding their disclosure obligations.

MEASURES TAKEN BY SAMURAI 2K AEROSOL SDN BHD

In working towards these commitments, we have taken the following steps:

1. Requiring our suppliers to implement a policy regarding Conflict Minerals and exercise due diligence to investigate the source of these minerals



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2. Engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. In the future, our suppliers' willingness to comply with this initiative will be a factor in our sourcing decisions

Like many other companies tracking Conflict Minerals, it will take time for a company of our size and complexity to collect the information needed for us to fully understand our use of Conflict Minerals and therefore be able to address all related customer concerns.

GRIEVANCE MECHANISM AND REPORTING

Queries regarding this policy, or violations thereof, can be reported through the following platforms:

• Write to us at: Samurai 2K Aerosol Sdn. Bhd.,

Attn: Legal Department

No. 6, Jalan Dato Yunus 1,

Tmn Perindustrian Dato Yunus Sulaiman, Lima Kedai,

81120 Skudai, Johor Malaysia

Email us at: grievances@samuraipaint.jp

Suppliers and other external parties are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this approach, or if they wish to report suspected violations. Other external stakeholders, may also report problems or concerns to the above Samurai 2K Aerosol Contact.

This Policy will be reviewed regularly and updated as needed.