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## Apogee Enterprises, Inc.

<b>Policy Number:</b>	PROC 5002	<b>Revision Number:</b>	2	<b>Effective Date:</b>	11/28/2022
<b>Policy Name:</b>	Conflict Minerals Policy	<b>Issue Date:</b>	9/10/2013	<b>Supersedes:</b>	9/10/2013
<b>Functional Owner:</b>	Manager, Procurement Analytics & Process Excellence, Sr.				
<b>Approved By:</b>	Chief Procurement Officer				

### **TITLE: Conflict Minerals Policy**

### **POLICY:**

As a publicly traded company, Apogee is required to comply with the 3TG Minerals provisions of the Dodd-Frank Act.

### **PURPOSE:**

The purpose of this policy is to define the process for management and communication of Conflict Minerals by Apogee.

### **SCOPE:**

This policy applies Company-wide including employees in the corporate offices and employees in any of the Company's subsidiaries, divisions, segment, business units or facilities, and members of the Apogee Board of Directors

### **DEFINITIONS:**

**3TG:** Refers to Tungsten, Tantalum, Tin, and Gold which are all minerals cassiterite, coltan, and wolframite. These are the minerals regulated by the US government.

**Conflict Mineral:** A mineral mined in an area of armed conflict and traded illicitly to finance the fighting.

**Dodd-Frank Act:** Requires publicly traded companies to inquire into the origin of 3TG Minerals in their supply chains and to report on their due diligence processes and findings in filings with the U.S. Securities and Exchange Commission.



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**DRC Region:** Democratic Republic of the Congo.

### **REQUIREMENTS AND ILLUSTRATIONS:**

The ongoing conflict and extreme violence in the Democratic Republic of Congo ("DRC") and surrounding regions (collectively, the "DRC Region") may be directly or indirectly financed by the mining of and trade in "Conflict Minerals" in the DRC Region. The term "Conflict Minerals" refers to tin, tungsten, tantalum and gold (collectively the "3TG Minerals"), and the ores from which they originate. The 3TG Minerals are present in the manufacture of a variety of commercial products, including some of the products fabricated and sold by Apogee and its BU's (collectively, the "Company"). Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the "Dodd-Frank Act") requires publicly traded companies to inquire into the origin of 3TG Minerals in their supply chains and to report on their due diligence processes and findings in filings with the U.S. Securities and Exchange Commission.

The Company will take the following steps to determine the use, source and origin of 3TG Minerals in its global product portfolio across all business units. The Company will use a reasonable documented process to:

- Work closely with suppliers to determine the potential use of 3TG Minerals in the Company's supply chain and, when appropriate, work with suppliers to remediate issues and source more responsibly.
- Expect suppliers to the Company to conduct the necessary inquiry and, where appropriate, additional due diligence to provide the Company with confirmation of the source of 3TG Minerals used in their processes and ultimately present in materials and/or products supplied to the Company.
- Encourage the suppliers to the Company to advocate and actively action our philosophy of sourcing 3TG Minerals from socially responsible suppliers, which may include conflict-free mines in the DRC Region.

### **TRAINING:**

Training on this policy is a self-study, with systemic signoff for evidence of training completion.



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**COMPLIANCE AND ENFORCEMENT:**

Any Corporate Policy created, revised, or published in a manner inconsistent with this policy shall be updated to be consistent with this policy.

**POLICY MANAGEMENT:**

Upon adoption, the Senior Manager Procurement Analytics shall be the Function Policy Owner for the management of this Policy.

**EXCLUSIONS:**

N/A

**COMPLIANCE PROGRAM OR CORPORATE POLICY REFERENCES:**

3TG Minerals provisions of the Dodd-Frank Act