UFP TECHNOLOGIES, INC.

Conflict Minerals Policy

Effective date	August 1, 2026
Supersedes	Conflict Minerals Policy dated May 2016
Approved by	Chief Financial Officer of UFP Technologies, Inc.
Review cycle	Annually

Our commitment

UFP Technologies, Inc. and its subsidiaries ("UFP" or the "Company") manufacture custom-engineered components, subassemblies, finished devices and packaging. Certain materials the Company purchases contain tin, tantalum, tungsten or gold — the minerals commonly known as conflict minerals — generally in trace amounts.

The mining and trade of these minerals has, in parts of central Africa and elsewhere, financed armed groups and been associated with forced labor, child labor and other serious human rights abuses. UFP does not want its purchasing to contribute to those harms. The Company is committed to:

- not knowingly purchasing materials containing minerals that finance or benefit armed groups, or that are associated with forced labor, child labor or other serious human rights abuses;
- conducting good faith, risk-based inquiry into the origin of the conflict minerals in its supply chain, guided by the OECD Due Diligence Guidance for responsible mineral supply chains;
- expecting the conflict minerals in its products to come, where they can be traced, from smelters and refiners validated by an independent third-party assurance program;
- reporting publicly and candidly each year on what its inquiry found, and on the limits of what it could determine;
- respecting internationally recognized human rights, and complying with applicable sanctions, import and forced-labor laws; and
- supporting responsible sourcing from the Democratic Republic of the Congo and its neighbors rather than withdrawing from the region. Legitimate mining is an important source of livelihood there, and a blanket embargo would harm the people this Policy is meant to protect.

Scope

This Policy applies to every UFP business unit, subsidiary and facility worldwide, and to all suppliers, contract manufacturers, distributors and other third parties that provide materials, components, subassemblies or finished goods to the Company. Newly acquired businesses are brought within the Company’s inquiry as promptly as practicable following closing.

The minerals covered are cassiterite (tin), columbite-tantalite or coltan (tantalum), wolframite (tungsten) and gold, and their derivatives. The countries of primary concern are the Democratic Republic of the Congo and its neighbors — Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia — though UFP’s inquiry is not limited to that region where credible reporting identifies risk elsewhere.

What we expect of our suppliers

Compliance with this Policy is a condition of doing business with UFP and is incorporated into the Company's standard terms and conditions of purchase. Suppliers are expected to:

- **Respond to our inquiry.** Complete and return the current Conflict Minerals Reporting Template ("CMRT") each year when requested, and answer follow-up questions.
- **Identify smelters and refiners accurately,** by facility name, country and identification number, for the minerals in the items they supply to UFP.
- **Source from validated facilities** wherever possible, and work toward removing facilities that decline independent assurance from the chain supplying UFP.
- **Pass these expectations on** to their own suppliers, and be able to show that they have done so.
- **Tell us promptly** if a facility loses its assurance status, a party in the chain becomes subject to sanctions or a forced-labor finding, or a credible allegation arises about minerals supplied to UFP.
- **Keep supporting records** and cooperate with UFP's reasonable inquiries.
- **Avoid claims they cannot support.** Suppliers should not describe material as "conflict free" or equivalent unless their own due diligence substantiates it.

How we put this into practice

Each year UFP reviews its products and materials to identify where conflict minerals may be present, surveys the relevant suppliers using the CMRT, and checks the smelters and refiners they report against published lists of validated facilities and against applicable sanctions and forced-labor restricted-party lists. Suppliers who do not respond, or respond incompletely, are followed up with and escalated, and their performance is taken into account in how UFP manages the relationship. UFP does not buy ore or refined metal directly, and relies on the independent audit programs established to validate the facilities that process these minerals.

Where the Company identifies a concern, it will ask for the information needed to resolve it and, if necessary, require corrective action. Persistent failure to engage may result in a supplier being placed on hold for new business or removed from approved supplier status. Termination is a last resort, though UFP will suspend sourcing immediately where continuing would breach sanctions or import law, or where there is credible indication of support to an armed group or of forced or child labor.

UFP reports the results of its inquiry each year in a Conflict Minerals Report filed with the U.S. Securities and Exchange Commission and published on the Company's website.

Raising a concern

Anyone — employee, supplier, customer or member of the public — may raise a concern about UFP's minerals sourcing or report a suspected violation of this Policy through the confidential reporting channels described in the Company's Code of Business Conduct and Ethics, anonymously where local law permits. UFP does not tolerate retaliation against anyone who raises a concern in good faith.

Governance and review

Responsibility for this Policy rests with the Chief Financial Officer. Personnel from Finance, Quality & Regulatory, Purchasing and Plant Management carry out the annual inquiry and review its results, and report on them to the finance leadership team This Policy is reviewed at least annually and updated when the Company's operations, supply base or legal obligations change materially.

This Policy states UFP's commitments and expectations. It does not grant additional rights to any supplier or third party, and does not modify or limit UFP's contractual or legal rights.