

February 9, 2023

## **Conflict Minerals Statement**

Section 13(p) of the Securities Exchange Act of 1934 and Rule 13p-1 thereunder (collectively, the “conflict mineral rules”) require certain disclosures concerning supply sources for conflict minerals –consisting of gold, tin, tungsten, or tantalum – that may be necessary to the manufacture or functionality of a company’s products. Terms and phrases used but not defined in this statement have the meanings given under the conflict mineral rules.

No conflict mineral is intentionally added to, or serves as a functional component of, products sold by Bonnell Aluminum (Corporate), Inc. (Bonnell) and its subsidiaries: Bonnell Aluminum, Inc., Bonnell Aluminum (Niles), LLC; Bonnell Aluminum (Elkhart), Inc.; and Bonnell Aluminum (Clearfield), Inc. However, the manufacturing process for certain of Bonnell’s finished aluminum extruded products utilizes chemical compounds in the finishing processes which include tin compounds as active ingredients. Depending on the type of chemical compounds in the finishing process used, trace amounts of such minerals may remain in some of the finished products.

Bonnell, a subsidiary of Tredegar Corporation, an issuer that files reports under the U.S. Securities and Exchange Commission’s (“SEC”) Exchange Act, understands the staff of the SEC has previously issued oral guidance that conflict mineral compounds are not subject to reporting under the SEC’s conflict mineral rules. However, in the absence of affirmative written SEC guidance on this point, Bonnell has conducted in good faith a reasonable country of origin inquiry regarding the conflict minerals described above for 2022. Such inquiry is reasonably designed to determine whether any of these minerals originated in the Democratic Republic of the Congo or an adjoining country (the “covered countries”), or are from recycled or scrap sources.

The tin chemical compounds used by Bonnell in 2022 were purchased from two third party suppliers. Bonnell’s country of origin inquiry includes obtaining from each of these suppliers for chemical compounds containing tin compounds an annual written declaration in the form of the Conflict Minerals Reporting Template (“CMRT”) provided by the Responsible Minerals Initiative (“RMI”). In addition to these inquiries, our contracts with each of these chemical suppliers require the suppliers to have and maintain procedures reasonably designed to ensure that any conflict minerals sold by the supplier to Bonnell will be conflict free.

The completed CMRT declarations revealed the following:

- 1) One supplier indicated that some of the tin in their alloys is sourced from post-industrial or post-consumer scrap and the primary tin that is used for manufacturing, alloying, or distribution purposes is produced solely from conflict-free smelters in their respective supply chains. Their covered country declaration represented that any covered country smelters or refiners used in the supplier’s supply chain in 2022 have been certified by the RMI in compliance with the Dodd-Frank Act.

- 2) The second supplier certified that the tin used in their chemical compounds originated in the covered countries. Smelters in their supply chain source tin from covered countries, including the Democratic Republic of the Congo and Rwanda, and have been certified by the Responsible Materials Institute to do so in compliance with the Dodd-Frank Act.

Based on these inquiries, we conclude that, with respect to chemical compounds containing tin compounds which were used in the manufacture of products by Bonnell in 2022, any minerals that originated in the covered countries were from covered country smelters or refiners used in the supplier's supply chain in 2022 have been certified by the RMI in compliance with the Dodd-Frank Act.

Based on the representations made in the covered country declarations regarding the supply chains upstream of Bonnell's direct chemical suppliers, together with information provided in further discussions with certain of these suppliers and the information available on the RMI website, we do not believe further diligence regarding these supply chains is necessary on Bonnell's part.

The tin compounds purchased from suppliers who provided covered country declarations under the RMI as described herein were used in the Bonnell's facilities and for production of the Bonnell products as listed below:

Bonnell Aluminum – Clearfield Plant:  
Anodized 2-Step Finished Aluminum Extrusions

Bonnell Aluminum – Newnan Plant:  
Anodized 2-Step Finished Aluminum Extrusions

Bonnell Aluminum – Carthage Plant:  
Anodized 2-Step Finished Aluminum Extrusions

Bonnell Aluminum – Elkhart Plant:  
Anodized 2-Step Finished Aluminum Extrusions

