



Traeger Conflict Minerals Policy

Background

Traeger is committed to avoiding the use of Conflict Minerals that directly or indirectly finance or benefit armed groups throughout the globe. Traeger fully supports the goals and objectives of laws concerning the use of conflict minerals, notably Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to end violent conflict and resulting human rights abuses funded through the trade of natural resources.

Traeger does not directly source Conflict Minerals from mines, smelters or refiners, and is several levels removed from these market actors. Traeger, therefore, expects all suppliers to assist us in tracing materials back to their origins, by declaring any components, parts, and products that contain Conflict Minerals and providing country of origin and other traceability information.

Conflict Minerals Defined

“Conflict Minerals” include Tin, Tantalum, Tungsten, Gold (known as 3TGs), Cobalt, or their derivatives. Traeger’s suppliers are required to declare annually that all products supplied to Traeger either (1) do not contain Conflict Minerals or, (2) do not contain Conflict Minerals that originated from conflict-affected and high-risk areas (“CAHRAs”).

Conflict Minerals Policy

To support Traeger’s policy objectives, suppliers are expected to, directly and indirectly, source Conflict Minerals only from sources that do not directly or indirectly benefit or finance armed groups in CAHRAS, including the Africa Great Lakes Region, or from any other region where natural resources fuel conflict. Traeger expects its suppliers to, where possible, source Conflict Minerals from smelters and refiners that are validated as being conflict free and otherwise implement, and require their direct and indirect suppliers to implement, policies, protocols, standards, systems, frameworks and procedures that are consistent with the Rule and the Organization for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Conflict Minerals Policy Guidelines

To account for our conflict minerals sourcing impacts, Traeger requires its suppliers to:

- Commit to the identification, reduction, and ultimate elimination of use of Conflict Minerals that directly or indirectly finance, or benefit armed groups anywhere around the world;
- Work with their upstream suppliers and supply chain to conduct due diligence to determine the source and chain of custody of Conflict Minerals that are contained in products or materials supplied to Traeger;
- Establish Conflict Minerals policies, due diligence frameworks and management systems for the traceability of Conflict Minerals consistent with the Organization for Economic Co-operation and Development Due Diligence

Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk-Areas, communicate an expectation to their suppliers that they do the same; and

- Cooperate with Traeger in its efforts to comply with any applicable reporting requirements (including future legal requirements), including providing timely responses to Traeger's inquiries regarding the origin and chain of custody of Conflict Minerals in products or materials supplied to Traeger (including the smelter, country of origin, mine location and status) and, upon request, adequate verification of such information.

Conflict Minerals Inquiries

Traeger's Conflict Minerals Policy is owned and implemented by Traeger's Director of Environmental Social and Governance Compliance. Inquiries regarding Traeger's Conflict Minerals Program should be send to ESG@traeger.com.