



Conflict Minerals Policy

Conflict Minerals Policy - Statement

HMH is committed to the responsible sourcing of all materials and components used in its products, whether manufactured directly by HMH or by a subcontractor or supplier (each a "Supplier"). HMH also remains committed to working towards a conflict-free mineral supply chain.

HMH expects its Suppliers to adopt policies and management systems to supply materials, products, and components that are conflict-free and to require their suppliers to adopt similar policies, systems and socially responsible sourcing practices.

HMH Commitment and Suppliers' Responsibilities

HMH is dedicated to fulfilling its obligation to uphold human rights with unyielding integrity. As part of this commitment, HMH maintains full adherence to the highest ethical principles in the global sourcing of all materials, including, but not limited to, tin, tantalum, tungsten and gold (commonly referred to as "3TG" or "conflict minerals") from conflict-affected and high-risk areas with regards to human rights abuses and funding of armed groups.

HMH reviews on an ongoing basis all its products to ensure that they do not contribute to any human rights abuse or funding of armed groups, wherever the area. Such a commitment is consistent with the HMH Code of Conduct and in accordance with the HMH Suppliers Integrity Guide, HMH requires the same commitment to all its Suppliers. The directives of 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 (the "OECD Guidance") are the standard followed by HMH concerning potential conflict minerals in manufacturing, procuring and sourcing all its products.

Suppliers are expected to take the following actions with respect to the products, components and materials provided to HMH:

1. Do not procure any material or component from sources that are known to directly or indirectly finance or support armed conflict or perpetrate human rights violation.
2. Ensure that conflict minerals are sourced in accordance with the highest ethical principles dictated by the OECD.
3. Implement policies, processes and procedures for the traceability of conflict minerals aligned with this Policy and the OECD Guidance.
4. Support HMH in its due diligence process, which includes providing, from time to time, information and written certifications, if required, concerning the origin of conflict minerals included in products, components or any material supplied to HMH.
5. Keep accurate and complete business records of the sources for the conflict minerals and allow HMH to review upon request.
6. Request their suppliers to adopt policies and procedures that are consistent with this Policy.

Suppliers are expected to fully comply with the principles and directives of this HMH Conflict Minerals Policy. Any non-compliance in their conduct will be reviewed and evaluated accordingly for future business and sourcing decisions. HMH will communicate this Policy to employees and Suppliers. It can be found on the HMH website at [HMH Conflict Minerals Policy](#).