

Conflict Minerals Policy

Policy Statement

The Company is committed to sourcing components and materials from suppliers that share our values regarding ethical business practices and environmental responsibility. We expect all suppliers to abide by all applicable laws and regulations, including fair labor practices and the support of all aspects and dimensions of human rights.

Purpose

As part of the Dodd-Frank Act of 2012, the U.S. Securities and Exchange Commission (the “SEC”) adopted final rules on the disclosure and reporting requirements with respect to the use of “conflict minerals” by public companies (the “Conflict Minerals Rule”). Pursuant to the Conflict Minerals Rule, the Company is required to report whether any conflict minerals necessary to the functionality or production of a product that we manufacture, or contract to manufacture, originate in a Covered Country.

Scope

Companies using conflict minerals in their manufacturing processes, whether sourced from a Covered Country or not, are required to disclose this use on a form called “Form SD,” to be filed with the SEC by May 31 annually.

Definitions

Conflict Mineral: is defined by the SEC as gold, wolframite (tungsten), cassiterite (tin), and columbite-tantalite (tantalum).

Covered Country: includes the Democratic Republic of the Congo (DRC) and those countries that share an internationally recognized border with the DRC (Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia).

Policy

OUR COMMITMENTS

The Company supports the goal of ending violence, human rights violations and environmental devastation in the Covered Countries and we are committed to complying with all requirements applicable to the Company under the Conflict Minerals Rule.

- We will support the aims and objectives of the Conflict Minerals Rule.
- We will not knowingly procure conflict minerals that originate from the Covered Countries that are not certified as “conflict free.”
- We will ask our suppliers to undertake reasonable due diligence with their supply chains to assure that:
 - Products supplied to the Company do not contain conflict minerals as elements necessary to their production or functionality
 - If products supplied to the Company do contain these minerals, the minerals:
 - Originated outside the Covered Countries
 - Were produced from scrap or recycled sources
 - Were supplied from smelters that have been validated by an independent private sector party to be conflict-free

If we discover that conflict minerals produced in the Covered Countries are present in any materials, parts, or components we procure, we will take appropriate actions to eliminate such conflict minerals produced in the Covered Countries from our products to restore compliance with this policy.