



Conflict Minerals Policy

Corporate Social Responsibility and Conflict Minerals

(Dodd-Frank Wall Street Reform and Consumer Protection Act 1502(b) also referred to as Conflict Minerals)

The Securities and Exchange Commission (SEC) has recently delivered its final ruling regarding conflict minerals as required in the Dodd-Frank Act. Although Cirtronics is not a publicly held corporation, we recognize that we support organizations that will be required to report under this new ruling. To fulfill our customers' needs, we are currently reviewing the ruling to determine the appropriate actions and reporting requirements given our position in the supply chain.

"Conflict Minerals" are defined as tin, tantalum, tungsten, gold and their derivatives, commonly referred to as "3TG". Cirtronics recognizes the importance of preventing the use of conflict materials from the Democratic Republic of the Congo (DRC) and adjoining countries, also known as "Covered Countries". These countries share an internationally recognized border with the DRC, which presently include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Cirtronics is not a manufacturer of electronics parts or components, nor do we specify the components used on our customers' products. The designated design authority for the customer is responsible to provide to the customer all the necessary declarations in support of their design and the customer is responsible to ensure their approved vendor list satisfies their sourcing requirements. The manufacturers of electronic parts and components are the only source of accurate information regarding substances, including any conflict minerals, used in the manufacture of their products and as such, this information should be obtained directly from the component manufacturers.

We do however manufacture product(s) that are designed, developed, and controlled by others. During the manufacturing process we may add materials derived from tin, tantalum, tungsten, and gold. For these materials we are engaging our suppliers and requesting that they supply us with a copy of their conflict minerals sourcing statements. We are also encouraging them to source and purchase materials from socially responsible suppliers and refrain from purchasing materials from known conflict sources.

Please be assured that Cirtronics understands the importance of this issue and we will not knowingly procure materials through conflict regions or sources. We are committed to the pursuit of responsible procurement practices and are pleased to be working with organizations that value corporate social responsibility and understand its importance as well.