

STATEMENT OF PRINCIPLES on Conflict Minerals

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act governing conflict minerals. Conflict minerals include tin, tungsten, tantalum, and gold (also referred to collectively as “3TG Minerals”) originating from the Democratic Republic of Congo or countries in that region. Publicly traded companies subject to Section 1502 must perform a reasonable “country of origin” due diligence inquiry on 3TG Minerals used in their supply chains and adhere to certain reporting obligations to the SEC. More information about Section 1502 can be found at: www.sec.gov/rules/final/2012/34-67716.pdf

We are not subject to the SEC regulations on conflict minerals. Nevertheless, consistent with our sense of corporate responsibility and in keeping with our company policies, including our Supplier Code of Conduct, we seek to conduct our business in a manner that is consistent with the intention of Section 1502 and to assist our customers who may have Section 1502 obligations. To that end, we want to assure our customers of the following:

- We do not knowingly purchase or knowingly use conflict minerals in our products. We do not source any 3TG Minerals directly from mines, smelters, or refiners and we are several levels removed from the direct market vendors of those materials.
- We undertake a due diligence process whereby we use the information we have about the material composition of our products to identify components or materials that could potentially contain metals extracted from 3TG Minerals. We then identify the suppliers of those components or materials and seek information from them to determine if the material composition of the products we are purchasing from them includes 3TG Minerals.
- Having taken these steps, we can represent that, to the best of our knowledge, the components of the parts we purchase are free of conflict minerals. This conclusion is based on a demonstration by suppliers, as required by our Supplier Code of Conduct, that they (1) have in place reasonable conflict minerals due diligence procedures for their suppliers and supply chain and (2) in their ongoing due diligence procedures, they have not identified any conflict minerals violations or suspected violations.
- We constantly monitor the compliance status of suppliers’ products on a component level to ensure the greatest level of accuracy of the information we are relying upon. In the event we were to be told or independently discover that a supplier to us is not providing us with conflict-free materials or components, we would immediately stop doing business with that supplier and find an alternative conflict-free supply source for that material or component.

Signed by: Valerie Sanderson

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