



Conflict Minerals Policy

In 2010, Congress enacted the Conflict Minerals provisions of the Dodd-Frank Street Reform and Consumer Protection Act with the goal of eliminating the illegal trade in gold, tin, tantalum and Tungsten “Conflict Minerals” extracted from designated “conflict areas”. “Conflict Minerals” refers to gold, tin, tantalum, and tungsten; and the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The intention of the act is to cut funding of armed groups that are involved in human rights abuses in the Democratic Republic of the Congo (DRC) and adjoining countries through a framework of due diligence applied throughout the global supply chain to eliminate use of these designated minerals. The rules require manufacturers who file certain reports with the Securities Exchange Commission (SEC) to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products. Training materials including a video and links to other support are available at www.conflictfreemelter.org.

Tech Manufacturing LLC (Tech) supports the objectives of the SEC position and will perform all necessary due diligence in order to avoid the use of “Conflict Minerals” Tech expects its suppliers to support its efforts, and to take steps to ensure that “Conflict Minerals” are not used in materials supplied to Tech In this regard, Tech is actively engaging with suppliers that provide materials that may contain “Conflict Minerals” requiring their cooperation to employ necessary due diligence with respect to the source of “Conflict Minerals” in materials supplied to Tech .

Tech Manufacturing LLC Commitment:

1. Support Tech customers in providing due diligence throughout the supply chain through an on-going, proactive and reactive reporting process.
2. Identify and asses risk of receiving “conflict minerals” throughout its supply chain.
3. Not knowingly procure specified metals that originate from facilities in the designated “conflict areas”.

4. Require the Tech supply base to provide written evidence documenting that the materials used in products or materials supplied are “conflict free”.

Tech’s Expectations of Our Suppliers:

1. Supply “Conflict Free” material, which means either: 1) “conflict minerals” necessary to the functionality or production of supplied materials must not directly or indirectly fund armed groups in the DRC or adjoining countries, or 2) “conflict minerals” in supplied materials must be from recycled or scrap sources.
2. Adopt conflict minerals policies. Suppliers must adopt a policy regarding “conflict minerals” that facilitates compliance with Tech policies, implement management systems to support compliance with these policies, and require their suppliers to take the same steps.
3. Collect information from their suppliers regarding the source and chain of custody of any “conflict minerals” in supplied materials, and cooperate with Tech and Tech customer inquiries regarding conflict minerals in supplied materials. Suppliers must pass down conflict minerals inquiries through the levels of the supply chain to the smelter level.

If it is discovered that any Tech suppliers are providing “Non-conflict Free” material, Tech will take appropriate actions to transition the product from “Non-conflict Free” material to “Conflict Free” material.