



Polytronix, Inc.

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Corporate Policy: Conflict Minerals

January 23, 2017

Re: Conflict Minerals Reporting – High Priority

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products that finance or benefit armed groups that perpetrate human rights abuses in the Democratic Republic of the Congo or an adjoining country.

“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 U.S. Secretary of State may designate other minerals in the future.

Corporate Policy:

Polytronix, Inc. continually strives to participate in the International Community as a partner with governmental organizations, industry groups and NGOs to identify and trace the sources of all Tantalum, Tin, Tungsten, and Gold (3TG Minerals) content in products manufactured and distributed to our customers.

Polytronix, Inc. has established a program of flowing down the requirements of the Dodd-Frank legislation on Conflict Minerals to all of our suppliers through stated requirements in the Polytronix, Inc. Supplier Quality Provisions. This requirement is referenced on all appropriate Purchase Orders and Contracts that require suppliers of components or parts containing any of the 3TG Minerals to disclose the mineral content and report the source of the mineral using the standardized CFSI CMRT Reporting Template.

Polytronix, Inc. suppliers should source only from CFSI certified smelters that are identified as “Conflict Free”. Through the use of the CFSI CMRT Reporting Template suppliers are provided with a list of acceptable conflict free smelters to assist all suppliers in adhering to the requirements of the Dodd-Frank legislation.

Polytronix, Inc. has communicated with each of the supplier representatives who represent manufacturers of products known to contain one or more of the 3TG Materials to ensure that they are aware of the requirements for compliance with the Dodd-Frank legislation and reporting of the source of any such material. Specifically, Polytronix, Inc. is requesting the supplier’s support in completing the industry standard report (CFSI - CMRT Conflict Minerals Report) found at: <http://www.conflictreesourcing.org/conflict-minerals-reporting-template/>

Polytronix, Inc. will continue to develop internal controls to manage the data collection procedures for identifying all sources of Conflict Minerals to ensure that we are in support of the restrictions of use of Conflict Minerals that will “benefit armed groups that perpetrate human rights abuses in the Democratic Republic of the Congo or an adjoining country.”