

Conflict Minerals Policy Statement

While Electro-Miniatures Corp. does not source any Conflict Minerals from the DRC and the Covered Countries directly, such Conflict Materials may exist in the products, materials and components that EMC sources from its suppliers. EMC is committed to working with its suppliers to responsibly source the materials and components that EMC uses in its products.

In 2012, the Securities and Exchange Commission (“SEC”) adopted final rules under Section 1502 of Dodd-Frank Wall Street Reform and Consumer Protection Act relating to “Conflict Minerals.” Section 1502 of the Dodd-Frank Act was adopted because Conflict Minerals originating from the Democratic Republic of Congo (the “DRC”) and adjoining countries (the “Covered Countries”) may directly or indirectly be funding or benefitting illegal armed groups committing human rights cruelty in that region. These Conflict Minerals from the DRC and the Covered Countries – tantalum, tin, tungsten and gold – are making their way into the supply chain of companies in the United States of America.

Under these Conflict Minerals rules and regulations, publicly-traded companies must report annually to the SEC if they use any Conflict Minerals from the DRC and the Covered Countries in the products they manufacture or contract to manufacture if the Conflict Minerals are necessary to the functionality or production of a product.

To facilitate compliance with these Conflict Minerals rules, Electro-Miniatures Corp. conducts inquiries of its supply chain in an effort to determine the source of any Conflict Minerals from the DRC and the Covered Countries and to assist in the reporting of the results of its inquiries. In order for us to accomplish this, we require our relevant suppliers to respond to information requests that EMC will send out on an annually basis regarding the uses and sources of Conflict Minerals from the DRC and the Covered Countries in their products, including information about minerals that have been recycled or scrapped. We also require our suppliers to obtain and utilize the latest version of the CMRT template for Conflict Minerals reporting, which is also provided as a link in our renewal notice that EMC will email to all vendor recipients annually. All documented reports will be kept on file and maintained.

Flow Downs

- To assist in compliance with the SEC rules and regulations relating to Conflict Minerals and to identify any products sold to Electro-Miniatures that contain any Conflict Minerals which are not DRC Conflict Free;
- To undertake reasonable due diligence within their supply chain to determine the source and chain of custody of their Conflict Minerals, including developing policies and systems to avoid the use of Conflict Minerals from the DRC and the Covered Countries; and
- Implement and communicate to their personnel and supplier’s policies that are consistent with this policy, and require their direct and indirect suppliers to do the same; and
- Incorporate procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable.