



## Conflict Mineral Policy

Revised: 11/20/2020

*While Electro-Miniatures Corp. (EMC) does not source any Conflict Minerals from the Democratic Republic of Congo (DRC) and the Covered Countries directly, EMC is committed to working with its suppliers to responsibly source minerals that are used in EMC.*

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 (DRC) and adjoining countries (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, companies must report annually to the SEC regarding usage of Conflict Minerals (and their source) 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 the Conflict Minerals rules, EMC regularly conducts inquiries of its supply chain to determine the source of any Conflict Minerals from the DRC and the Covered Countries. In order for us to accomplish this, we require our suppliers to fill out the Conflict Minerals Reporting Template (CMRT) regarding the uses and sources of Conflict Minerals in their products, including minerals that have been recycled or scrapped.

### Flow-Downs to Suppliers:

- To assist in compliance with the SEC rules and regulations relating to Conflict Minerals and to identify any products sold to EMC that contain any Conflict Minerals which are not DRC Conflict Free;
- To undertake reasonable due diligence within their supply chain and 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 suppliers’ policies that are consistent with this policy, and require their direct and indirect suppliers to do the same;
- Incorporate procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable.