

Conflict Minerals Policy

Background - The U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and the SEC Rule require publicly-traded companies to disclose whether the products they manufacture contain certain “conflict minerals” – cassiterite (tin), wolframite (tungsten), columbite-tantalite (tantalum), gold, or their derivatives originating in the Democratic Republic of the Congo (“DRC”) or an adjoining country – have been found to support the civil conflict and human rights violations in the region. If so, a report must be filed specifying those products and the due diligence measures taken to determine their source.

Indicor’s Conflict Minerals Policy - We are committed to complying with this legislation and with the SEC Rule. Cooperation from our supply chains is necessary to provide source information, as we do not purchase these minerals directly from mines or smelters and, in many cases, purchase finished goods that are several layers removed from these sources. Accordingly, our suppliers are expected to commit DRC conflict-free and to provide the needed transparency of the supply chain so that components and materials supplied to us are DRC conflict-free. We require our suppliers to adopt and implement policies, due diligence frameworks, and management systems, consistent with the OECD Guidance, to accomplish this goal.

Additionally, we request our suppliers to utilize the Electronic Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) Conflict Minerals Reporting Template and provide the template to their suppliers successively upstream in order to identify the relevant smelters and refiners. The results of this effort are compiled and reported to us through this template and/or a SaaS solution we provide.