

TECNOBIT CONFIDENTIAL

CONFLICT MINERALS POLICY

The Democratic Republic of the Congo (DRC) and the adjacent countries are currently mired in conflict with armed groups perpetuating human rights abuses in that region. These armed groups have been trading in certain minerals commonly found in that region to finance their activities.

These four minerals - columbite-tantalite also known as coltan (tantalum), cassiterite (tin), gold and wolframite (tungsten) – are commonly found in many products, ranging from jewelry to electronics to airplane components. To the extent these minerals are found to be financing armed activities, these four minerals are commonly referred to as "conflict minerals."

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act governing Conflict Minerals. On May 17, 2017, The European Parliament and the Council passed the REGULATION (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas. Both regulations are intended to stop:

- conflict minerals and metals from being exported to the EU and U.S.
- global smelters and refiners from using conflict minerals
- mine workers from being abused

To help our customers to ensure compliance with this U.S. and UE regulations, TECNOBIT S.L.U. has exercised due diligence since 2013 to determine the country of origin and chain of custody for minerals in its supply chain in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or other internationally recognized framework.

It is also TECNOBIT's policy to require its suppliers to source materials from smelters determined to be compliant with the Electronic Industry Citizenship Coalition (EICC) / Global e-Sustainability Initiative (GeSI) Conflict-Free Smelter (CFS) Program protocols, or other smelters that have been determined to be conflict-free smelters or determined to be conflict-free under other trusted traceability projects.

TECNOBIT S.L.U. recognizes that challenges that lie ahead in establishing reasonable practices to break through existing complexities and barriers to information throughout the Conflict Minerals supply chain. Working together, TECNOBIT S.L.U. and its suppliers can help establish traceability of Conflict Minerals that will promote the eradication of human rights abuses associated with DRC regional mining activities, and assurance to our end customers that our products and materials are responsibly sourced.

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