



CONFLICT METALS

History: The U.S. Conflict Minerals Law (Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) became effective on July 21, 2010. The law defines conflict minerals as certain minerals originating from the Democratic Republic of the Congo (DRC) or adjoining countries. Regulations have been implemented regarding the law and SEC registered companies are required to report the use of any conflict minerals/Metals originating from the DRC or adjoining countries. Ktron Inc. is not an SEC registered company, however many of our customers are SEC registered. Therefore Ktron Inc. and sub-tiers may be subject to third party audits to verify compliance.

KtronPolicy: If the goods or services contain tin, tantalum, tungsten, and/or gold (whether in raw or processed form, and whether or not combined with other materials), Seller hereby certifies that such metals have not been sourced in a manner which directly or indirectly finances or benefits armed groups in the Democratic Republic of the Congo or adjoining countries (Sudan, Uganda, Tanzania, Angola, Zambia, Ywanda, Burundi, Central African Republic, Congo Republic).

In addition, Seller shall have and implement its own Conflict Mineral Policy which at a minimum be aligned with buyers policy (stated above), and shall include a commitment to legal compliance and shall be communicated to Seller's suppliers. Seller shall ensure that purchased tin, tantalum, tungsten, and/or gold originate from smelters validated/certified by third parties in accordance with procedures adopted by the Electronic Industry Citizenship Coalition as being conflict mineral free. Seller shall work with sub-suppliers to ensure traceability of these metals within their products, back down to smelter and mine. Traceability data shall be maintained and recorded for 10 years. Documentation shall be provided to Buyer upon request.

Ktron Inc. shall flow-down the following on all purchase orders for material, product, and chemical processing:

"Supplier must include on their C of A and/or C of C that material, product, and any processes included in this order are conflict mineral free."