



Conflict Minerals Policy

Whereas Strongwell is a privately held company and not subject to the Conflict Minerals Rule contained within the Dodd-Frank Act, we oppose human rights violations occurring in the Democratic Republic of the Congo (DRC). As these actions are reportedly being financed from revenues of tin, tantalum, tungsten and gold (3TG or “conflict minerals”) mined in the DRC and surrounding countries, none will knowingly be added into any product we manufacture.

Strongwell chooses to purchase raw materials that are “DRC conflict free” as defined in the Exchange Act Section 13(p)(1) and we favor suppliers that report that no 3TG is contained in their products. If any products provided to Strongwell contain 3TG that are necessary to the functionality or production of those products, suppliers must identify the facilities used to process the 3TG in those products, if known, the country of origin of the 3TG in those products, if known, and describe the efforts of the supplier to determine the mine or location of origin of the 3TG with the greatest possible specificity.

Presently the Electronic Industry Citizenship Coalition/Global e-Sustainability Initiative (EICC/GeSI) template is the standard for collecting conflict mineral information. We ask all suppliers of raw materials to complete the EICC/GeSI questionnaire for the products Strongwell purchased during the prior year. We will work with our suppliers as needed to make year-to-year improvements in the accuracy and completeness of the 3TG information we provide to our customers. Should we learn that a supplier deliberately falsified information contained on their EICC/GeSI questionnaire, corrective action will be undertaken by Strongwell which may include the discontinuation of sourcing such product from that supplier.