

Conflict Minerals Compliance Policy

Section 1502 of the Dodd-Frank Act and the Securities and Exchange Commission Rules (SEC) adopted in connection therewith, require certain corporations to report the use of "Conflict Minerals" in the manufacture of their products. Generally, Conflict Minerals collectively refers to tin, gold, wolframite, tantalum, and tungsten, which originate from the Democratic Republic of the Congo (DRC) or specified adjoining countries (referred to herein as "Covered Countries").

In order to determine if our manufactured products contain Conflict Minerals, we have conducted a survey of our key suppliers to ascertain their use of any Conflict Minerals in the materials they supply to us. The results of that survey demonstrate that our key suppliers do not use Conflict Minerals in the materials they supply to us and therefore we have no reason to believe the Conflict Minerals they use may have originated in the Covered Countries, and/or reasonably believe that the Conflict Minerals they use are from recycled or scrap sources. Consequently, we can in turn represent that, to the best of our knowledge, our manufactured products either do not contain Conflict Minerals, or to the extent they may, such products are "DRC conflict free" as defined by Section 1502 of U.S. Dodd Frank.

We collect the conflict minerals list periodically from our key suppliers to ensure that we are able to identify the use of Conflict Minerals in our supply chain and the representations made in this compliance statement remain accurate.

28-Jan-2021

Regulatory Affairs

This is a digital version of the Conflict Minerals Compliance Policy which bears no signature. If a copy of this policy with an actual signature should be needed, please contact your local Bronkhorst High-Tech sales office.