

POLICY ON CONFLICT MINERALS

I. Purpose

The purpose on creating this policy is towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict. As JEM Engineering is required to comply with this US law, this policy describes the compliance process that JEM Engineering will follow to meet that obligation.

II. Policy

As a socially responsible company, JEM Engineering, LLC (JEM Engineering) has concern for the well-being of people and communities. We support the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC¹) and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda). In response to violence and human rights violations in the mining of certain minerals from the “Conflict Region”, the U.S. Securities and Exchange Commission² (SEC) has adopted rules to implement reporting and disclosure requirements related to “conflict minerals,” which are gold, as well as tin, tantalum, and tungsten, regardless of where they are sourced, processed or sold, as defined by the United States Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e) defined in 2010. The rules require manufacturers to file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products. JEM Engineering is committed to the responsible sourcing of “conflict minerals” throughout our supply chain and to continuing to comply with the underlying SEC rules and regulations surrounding “conflict minerals”.

III. Expectations for Vendors

In support of JEM Engineering’s Policy on Conflict Minerals (if applicable), vendors are expected to supply materials that are “DRC Conflict-Free” (if applicable). DRC includes the countries of Democratic Republic of Congo, Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda. Vendors are expected to adopt policies and management systems with respect to conflict minerals (if applicable) and to require their vendors to adopt similar policies and systems. JEM Engineering expects vendors to establish their own due diligence program to ensure conflict-free supply chains. In the event JEM Engineering determines that a supplier’s efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, JEM Engineering reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier. Under the definition of “DRC Conflict-Free,” products supplied to JEM Engineering: 1. Do not contain tantalum, tin, tungsten or gold (3TG³) as elements necessary to their production or functionality, or, 2. If products supplied to JEM Engineering do contain these minerals, the

¹ Democratic Republic of Congo

² U.S. Securities and Exchange Commission

³ Tin, Tungsten, Tantalum and Gold

minerals must originate outside the DRC, come from scrap or recycled sources, or be supplied from smelters that have been validated by an independent private sector party to be conflict-free. Certified conflict-free smelters are validated as compliant to the EICC (Electronic Industry Citizenship Coalition) conflict free smelter (CFS⁴) protocol using the CFS Compliant Smelter List. Through the CFS protocol, smelters are audited globally; the list of compliant smelters and refiners is posted at www.conflictreesmelter.org. JEM Engineering will survey direct vendors as a part of our Conflict Minerals Reporting process. Vendors are expected to respond in to survey requests in a timely manner, and with full disclosure following the specific instructions provided.

IV. Referenced Documents

714-0036-000_v1.0 Conflict Mineral Mines Compliance Declaration

⁴ Conflict free smelter