

## P-9.0083

### POLICY ON CONFLICT MATERIALS

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#### SECTION I: PURPOSE

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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 United States law, this policy describes the compliance process that JEM Engineering will follow to meet that obligation.

#### SECTION II: POLICY

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As a socially responsible company, **JEM Engineering prioritizes the well-being of people and communities**. We support the efforts of human rights organizations to end violence and atrocities in Central Africa. In response to violence and human rights violations in the mining of certain minerals from the “Conflict Region,” the U.S. Securities and Exchange Commission (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”.

#### SECTION III: EXPECTATIONS FROM SUPPLIERS

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In support of JEM Engineering’s Policy on Conflict Minerals (if applicable), **suppliers 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.

JEM Engineering expects its suppliers to adopt policies and management systems with respect to conflict minerals (if applicable) and to require *their* suppliers to adopt similar policies and systems. Suppliers are also expected 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/or 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 (3TG) as elements necessary to their production or functionality, or, 2) if products supplied to JEM Engineering do contain these minerals, the 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](http://www.conflictreesmelter.org).

JEM Engineering will survey direct suppliers as a part of our Conflict Minerals Reporting process (**FORM-14.0036**). Suppliers are expected to respond in to survey requests in a timely manner, and with full disclosure following the specific instructions provided.

#### SECTION IV: REFERENCED DOCUMENTS

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(JEM Doc: 714-0036-000) *FORM-14.0036: CONFLICT MINERALS DISCLOSURE*

# FORM-14.0036

## CONFLICT MINERALS DISCLOSURE – PAGE 1 of 2



### SECTION I: IDENTIFYING DRC COUNTRIES, 3TGs & CONFLICT MINERALS

JEM Engineering is committed to the responsible sourcing of conflict minerals throughout our supply chain and to continuous compliance with the underlying U.S. Securities and Exchange Commission (SEC) rules and regulations surrounding conflict minerals. In support of JEM Engineering’s Policy on Conflict Minerals (if applicable), vendors are expected to supply materials that are “DRC Conflict-Free.”

As defined by the **Dodd Frank Conflict Minerals Regulation, Section 1502**, conflict minerals that are mined and traded in the Democratic Republic of Congo (DRC) and its adjoining countries.

#### DRC countries include

- Democratic Republic of Congo
- Sudan
- Central Africa Republic
- Uganda
- Congo Republic
- Angola
- Angola
- Tanzania
- Rwanda
- Burundi
- Zambia

The following (3TGs) are currently considered conflict minerals when they originate from DRC countries, and conflict-free otherwise.

- Tin
- Tungsten
- Tantalum
- Gold

Please email the completed form to [purchasing@jemengineering.com](mailto:purchasing@jemengineering.com). For more information, reference for our full **policy on Conflict Minerals**.

### SECTION II: SUPPLIER INFORMATION

Company Name:		Today’s Date (mm/dd/yyyy):	
Contact Person:	Email:	Phone#:	
Street Address & Suite/Unit#:	City:	State (Country if Non-US):	Zip/Postal Code:

### SECTION III: CONFLICT MINERALS DISCLOSURE

Only select and authorize the statement that applies to your company.

**A**

*“My company’s products DO NOT contain conflict minerals from DRC countries.”*

\_\_\_\_\_  
Signature

**B**

*“My company’s products DO contain conflict minerals from DRC countries.”*

\_\_\_\_\_  
Signature

If you selected Option B, please fill out SECTION III.A on the next page.

\*\*If an of your company's products contain 3TGs from DRC countries, please fill out the this page and include it with all other shipping documents (CofC, Packing List, etc.) every time you ship your products to JEM Engineering.\*\*

**SECTION III.A: 3TG COMPLIANCE DECLARATION & CERTIFICATE OF CONFORMANCE**

If products you have supplied or will be supplying to JEM Engineering do contain **tin, tungsten, tantalum**, and/or **gold**, they must be DRC conflict-free. This means that they 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.

In this section, please indicate the line items included in current or previous JEM Engineering Purchase Orders that DO NOT contain conflict minerals, as described in *SECTION I*. Items listed below must either 1) **not contain 3TGs** or 2) **only contain DRC conflict-free 3TGs**.

(Your) Part No.	JEM Part No. ###-###-#####	Item Description	Manufacturer and/or Country of Origin

*By signing this, I certify that the items listed above **do not contain Conflict Materials**, as they are described by the U.S. SEC.*

\_\_\_\_\_

Signature

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Date