

## **Novatech Controls Conflict Minerals Policy**

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Novatech is committed to upholding its corporate and social responsibilities regarding corporate ethics, environmental protection, quality and safety, health, human rights and labour. These values extend to our sourcing and procurement of supplies and materials used in the manufacture of Novatech products.

The United States government has identified four minerals as being potentially 'conflict minerals' mined in the Democratic Republic of the Congo (DRC) and some adjoining countries;

- Tantalum (columbite-tantalite or coltan ore)
- Tin (cassiterite ore)
- Tungsten (wolframite ore)
- Gold

In areas of the Democratic Republic of the Congo and some adjoining countries, it is known that illegal mining, corruption, looting and smuggling of these commodities is used to finance and benefit armed groups that are perpetrators of human rights abuses.

Novatech Controls does not directly source or process conflict minerals; conflict minerals are however present in some of our products in the form of solder, mineral used in the manufacture of some electrical components and trace amounts in metal alloys.

We are committed to ensuring that our products do not contain Conflict Minerals sourced from mines that directly or indirectly benefit armed groups. In accordance to our commitments we have taken the following actions: -

- Undertake an internal Conflict Mineral Survey in accordance with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance, to identify all conflict minerals present in our products and supply chain.
- Implemented company policy that involves ongoing proactive and reactive due diligence approaches to eliminating Conflict Minerals present in our products that cannot, to the best of our knowledge and abilities, be confirmed as DRC conflict-free.
- Require our first-tier suppliers implement their own policy regarding Conflict Minerals and exercise due diligence and management systems consistent with the OECD Due Diligence Guidelines and EICC Code of Conduct.
- Take appropriate actions to eliminate all products containing Conflict Minerals in our supply chains from companies that do not promote the responsible sourcing of Conflict Minerals from DRC and adjoining countries.