

Ohmite's Conflict Minerals Policy

Dodd-Frank Act

On Aug. 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) was approved by the U.S. Securities and Exchange Commission (SEC). The rule requires companies such as Ohmite that are listed on U.S. stock exchanges to make reasonable inquiries, and depending on the circumstances, undertake further due diligence to try to determine the source and chain of custody of conflict minerals that may be used in their products, and to publicly report on an annual basis whether any such conflict minerals originate and finance armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries. The conflict minerals are tin, tantalum, tungsten and gold (also known as 3TG). Although Ohmite does not directly purchase any raw 3TG minerals from our suppliers, Ohmite purchases component parts from its suppliers that could include 3TG derived from mines in the DRC or adjoining countries.

Taking Social Responsibility

The CFSI is an industry-wide initiative created to develop control systems regarding smelters and refiners through independently validated audits under CFSI's Conflict-Free Smelter Program (CFSP). Through the CFSP, the CFSI identifies smelters and refiners that produce conflict-free materials. In order to confirm that status, CFSI uses specially trained independent third-party auditors to verify that these smelters and refiners can be deemed conflict-free. CFSI publishes online a list of smelters and refiners that meet the standards of the audit. In addition, CFSI developed the Conflict Minerals Reporting Template (CMRT) to standardize the collection of conflict minerals information from suppliers throughout the industry's supply chains.

Ohmite sends the CMRT to our suppliers on an annual basis and asks them to provide information regarding the smelters/refineries in their supply chains. Ohmite's expectations for suppliers is they adopt a policy on the responsible sourcing of minerals; implement due diligence processes to support that policy; and complete and return the CMRT to Ohmite.

Our Expectations for Suppliers

Specifically, Ohmite expects each of our suppliers to do all of the following:

- Adopt a policy of responsible sourcing of minerals and pass this requirement through its supply chain;
- Implement due diligence processes and mitigation plans to support that policy;
- Source materials from socially responsible suppliers; and
- Complete and return to us the CMRT in a timely manner and provide us all other information we may request regarding the sourcing of minerals in products they supply.