

	Page No: 1 of 1	Policy No: POL840-01-02
	Effective Date: 1/5/2020	Revision Level: A
Title: CONFLICT MINERALS POLICY		

Vadatech is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Vadatech seeks to source products, components and materials from companies that share our values around human rights, ethics and environmental responsibility.

In recent years there has been increased concern that the exploitation and trade of certain minerals originating in the Democratic Republic of the Congo and surrounding countries are helping to finance armed conflict characterized by extreme levels of violence. Tin, tantalum, tungsten and gold are commonly referred to as "conflict minerals" (3TG) regardless of their country of origin. As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the U.S. Securities & Exchange Commission (SEC) has adopted a rule to bring greater supply chain transparency to the use of conflict minerals originating from the Democratic Republic of the Congo and surrounding countries. The SEC's Conflict Minerals Rule requires SEC registrants who manufacture or contract to manufacture products containing conflict minerals that are necessary to such products' functionality or production to disclose the origin and status of the conflict minerals.

Policy Statement

Vadatech, together with its subsidiaries, fully support this legislation and is committed to responsible sourcing of 3TG as well as full compliance with the requirements of the Rule. Vadatech embraces the industry coalition's due diligence and reporting processes that seek to ensure supply chain transparency by obtaining 3TG country of and other origin information from all suppliers directly managed or sourced by Vadatech.

To aid this compliance, Vadatech has adopted Supplier Code of Conduct requiring that applicable suppliers to Vadatech to adhere to the following:

- Commit to identifying and eliminating the use in materials supplied to Vadatech of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and surrounding countries;
- Work with their own upstream suppliers and supply chain to determine the source and chain of custody of any products containing conflict minerals supplied to Vadatech;
- Establish their own policies, due diligence frameworks and management systems for the traceability of conflict minerals consistent with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, and communicate an expectation to their suppliers that they do the same; and
- Cooperate with Vadatech in its efforts to comply with any applicable reporting requirements of governmental agencies (including without limitation the SEC Conflict Minerals Disclosure Rule).

Suppliers will continue to be required to comply with complementary policies of Vadatech.

We have mechanisms for employees, suppliers, and other interested parties to report violations of our Conflict Minerals Policy. The global compliance Conflict Minerals inquiry email address is: Conflict.Minerals@Vadatech.com