

Conflict Minerals Compliance Statement

Issued by Department::

Engineering

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Scaletron Industries is deeply concerned by reports that profits from the sale of certain metals mined in the Democratic Republic of the Congo (DRC) or adjoining countries has helped fuel war and human rights violations in the eastern Congo. Section 1502 of the Dodd - Frank Wall Street Reform and Consumer Protection Act, and the Securities and Exchange Commission Rules adopted in connection therewith, require certain corporations to report the use of "Conflict Minerals" in the manufacture of the their products.

While Scaletron Industries, as a privately held corporation, is not subject to the Conflict Minerals rules and reporting requirements, we understand that our customers may be, and we are committed to helping our customers comply with their reporting requirements.

Generally, Conflict Minerals collectively refers to cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, including tantalum, tin and tungsten, which originate from the Democratic Republic of the Congo or specified adjoining countries (referred to herein as "Covered Countries").

Scaletron, like many companies in the industrial and consumer electronic industries, uses components containing tantalum, tin, gold and tungsten to manufacture industrial and consumer electronic products. Each of these metals has specific electrical properties which are necessary for the function of our products. Scaletron does not procure 3TG minerals directly from mines or smelters.

Scaletron supports efforts to eliminate the use of tantalum, tin, gold and tungsten from improper sources that could promote such serious problems in the DRC and adjoining countries. In order to determine if our manufactured products contain Conflict Minerals, we have an on-going requirement of our key suppliers to ascertain their use of any Conflict Minerals in the materials or components they supply to us.

Scaletron requires that suppliers whose products contain tantalum, tin, gold and tungsten submit a Certificate of Compliance that traces the metals back through the supply chain. Our objective is to have a conflict-free supply chain. If Scaletron becomes aware of a supplier whose supply chain includes metals from a conflict source, we will take the appropriate actions to remedy the situation in a timely manner, including reassessment of supplier relationships, to achieve that objective. Scaletron expects our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain. To that end, we reserve the right to amend this statement at any time based on subsequent developments or information.



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