

Gunze Electronics, USA Policy for Sourcing Conflict Minerals

The mining and distribution of "conflict minerals" (1) originating from the Democratic Republic of the Congo (the "DRC") are sometimes controlled by violent organizations in order to fund conflict in that country and adjacent regions.

Our industry supply chains are inadvertently subject to metals derived from these conflict minerals which can be introduced through the metals we use such as gold, tin, tantalum and tungsten. Gunze Electronics, USA is dedicated to the elimination of these conflict minerals in our supply chain and to using only responsibly sourced conflict-free minerals. (2)

We expect our suppliers to source conflict-free minerals from smelters or refineries that have been certified by an independent third-party audit program to fulfill our objective. We exercise due diligence with our suppliers on the origin and supply chain of minerals in accordance with the "Organization for Economic Co-operation and Development Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" to establish conflict minerals management mechanism.

All suppliers support this policy by:

- Being diligent in their assessment and validation of their supply chains to ensure Gunze Electronics USA objectives of a transparent supply chain and conflict-free purchases are inputs to the services and products we produce.
- Being in compliance at all times with all regional and international regulations for conflict minerals.
- Being in compliance at all times with industry standards for the sourcing and reporting of conflict minerals.
- Being diligent and accurate in their formal assurances of conflict-free minerals provided to us.

- 1- Conflict minerals are columbite-tantalite (coltan), cassiterite, gold, and wolframite, or their derivatives as defined in the Dodd-Frank Act Section 1502 and SEC Rule 13p-1 under the Securities Exchange Act of 1934.
- 2- Conflict-free minerals are conflict minerals that through their distribution directly or indirectly do not benefit violent organizations in the Democratic Republic of the Congo and its adjacent regions.