



Conflict Mineral Policy Statement

PendoTECH supports ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals”, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The definition of conflict minerals refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold. PendoTECH supports these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of conflict minerals.

PendoTECH does not purchase any conflict minerals for its products or components within its products directly from mines, smelters, or refiners. Rather, PendoTECH contracts with various suppliers to manufacture or supply its products or components. PendoTECH must therefore rely on its suppliers to provide information regarding the origin of the conflict minerals.

Our Commitment:

- Support the aim and objectives of the U.S. legislation on the supply of conflict minerals.
- Do not knowingly procure specified metals that originate from facilities in the Conflict Region that are not certified as conflict free.
- Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from:
 - Mines and smelters outside the Conflict Region or
 - Mines and smelters which have been certified by an independent third party as conflict free, if sourced within the Conflict Region

This due diligence includes having our suppliers provide written evidence documenting that raw materials used to produce gold, tin, tantalum, and tungsten, used in materials to manufacture components and products supplied to PendoTECH are sourced from non-conflict regions. The aim is to ensure that only “conflict free” materials and components are used in products that we procure.

If we discover the use of these minerals produced in facilities that are considered to be non-conflict free, in any material, parts, or components we procure, we will take appropriate actions to transition product to be conflict free.

As a downstream purchaser several steps removed from the mining, smelting, refining, and processing of natural metals, we confront inherent challenges in tracing the origin of conflict minerals in our manufactured goods. The activities outlined above, however, are reasonable efforts to ensure that the products we supply do not contain metals used to support armed conflict and human right abuses in the Democratic Republic of the Congo and neighboring countries.

Sincerely,

Dennis Annarelli, Ph.D.
Technical & Quality Manager