

SubSem CONFLICT MINERAL FAIR LABOR STATEMENT

SubSem will support the objectives of Section 1502 of the Dodd- Frank Wall Street Reform and Consumer Protection Act of 2010 on the use of “conflict minerals”. SubSem will not knowingly procure metals that originate from facilities in the Democratic Republic of Congo or adjoining countries (collectively, “Covered Countries”) unless certified as “conflict free”. We will ask our suppliers to undertake reasonable due diligence with their supply chain to assure that these metals are sourced only from mines and smelters outside the “Covered Countries” or from mines and smelters which have been certified by an independent third-party as “conflict free” and to report results in the industry standard format.

SubSem will take appropriate action to transition product to be “conflict free” should we discover the use of “not conflict free” minerals in any parts or components that we procure.

SubSem recognizes that extracting, trading, handling, and exporting minerals (such as columbite-tantalite, cassiterite, gold, wolframite, smaltite, cobalt, or their derivatives etc...), from conflict-affected and high-risk areas may lead to human rights or related abuses. As a good corporate citizen, SubSem has the responsibility to respect human rights and not contribute to these conflicts. SubSem commits to refraining from any action which contributes to the financing of conflict and to comply with relevant United Nations (UN) sanctions resolutions or, where applicable, laws implementing such resolutions.

SubSem will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the payment by any party of the following human rights or related abuses:

- Any forms of torture, cruel, inhuman or degrading treatment;
- Any forms of forced or compulsory labor;
- Child or underage labor;
- Other gross human rights violations and abuses;
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

Measures underway to meet the above requirements,

- Responsible Minerals Sourcing Policy
- Implemented Due Diligence Process in accordance with OECD guidance
- Remediation of high-risk smelters/refiners
- Conflict-Free Conflict Minerals Reporting Template (CMRT) (current version)
- Compliant Cobalt Reporting Template (CRT) (current version)