



Conflict Minerals Policy

Adopted Aug 27, 2013; revised Aug 17, 2017

- American Precision Electronics, Inc. (APE) is aware of the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 (“Conflict Minerals Act”). The Conflict Minerals Act requires, among other things, that companies perform due diligence on their supply chains regarding the source of conflict minerals defined in the Conflict Minerals Act to ensure such minerals are “DRC conflict free”. Conflict minerals are defined in Section 1502 of the Conflict Minerals Act as *cassiterite (a primary tin ore), columbite-tantalite (coltan, the mineral from which tantalum is extracted), gold, wolframite (a tungsten ore), and any other minerals determined by the Secretary of State to be financing conflict in the Democratic Republic of Congo and its adjoining countries (“DRC countries”)*
- APE supports governments, non-government organizations, and industry groups in their effort to eliminate trade of these “conflict minerals” from the DRC countries. APE is committed to refrain from actions that contribute to financing the conflict.
- APE has adopted a policy to monitor and perform reasonable due diligence within its supply chain to ensure that the minerals used in our products are not procured as “conflict minerals”. This includes procuring declarations on this issue from all suppliers providing components and materials on our products. APE is actively requesting, reviewing and monitoring such declarations using the Conflict Minerals Reporting Template (CMRT) that was created by the Responsible Minerals Initiative (RMI) as a common means for the collection of sourcing information related to “conflict minerals”.
- APE shall provide our RMI CMRT to customers on their products and interested parties upon request.
- In the case that APE finds proof that conflict minerals have been used to produce products, the customers having received these products will be informed of this fact.