



Conflict Minerals Policy

AAC's CFSI_CMRT template

Revision 5.11

Date: April 27, 2018

1.0 Scope:

This Specification describes restrictions applicable to all Goods to ensure that the materials, components and production processes for Goods sold to AAC, Inc. comply with the latest revision of the United States Dodd-Frank Wall Street Reform Act on 15 July 2010, containing reporting obligations for tin, tantalum, tungsten and gold (referred to as conflict minerals). This law drives companies using these metals in their products to investigate their sources and ensure they are not supporting the ongoing conflict in the Democratic Republic of the Congo.

Suppliers shall exercise due diligence, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, on their entire supply chain with respect to the sourcing of all tin, tantalum, tungsten, and gold contained in their products, to determine whether those metals are from the Democratic Republic of the Congo (DRC) or any adjoining country and, if so, to determine whether those metals directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses in the DRC or an adjoining country. Countries that adjoin the DRC are Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

2.0 Definitions:

AAC, Inc: American Accurate Components, Inc.

Goods: Any material, part, sub-component, component, or product, that is to be incorporated into a AAC, Inc. product.

Supplier: Any person that provides, manufactures, procures, assembles, and/or processes Goods for use in a AAC, Inc. product.

3.0 Conflict Minerals Restrictions:

Suppliers may only use tin, tantalum, tungsten or gold in Goods if the Supplier can reasonably demonstrate that it has exercised due diligence on the source and chain of custody of such metals in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance").

If the Supplier cannot reasonably demonstrate that it has exercised due diligence in accordance with the OECD Guidance with respect to any tin, tantalum, tungsten or gold, then the Supplier must not use the affected metal in any Goods.

The Supplier must provide to AAC reasonable documentary evidence of the Supplier's exercise of due diligence in accordance with the OECD Guidance. Suppliers shall maintain written records of their due diligence activities and shall make such records available to AAC upon request.

Suppliers must distribute this Conflict Minerals Restrictions Specification to all procurement personnel and factory management for all of the Supplier's facilities producing Goods and must ensure their facilities' compliance with the obligations and requirements in this Specification.

4.0 Due Diligence for Responsible Supply Chain Management:

The OECD Guidance establishes a framework for exercising due diligence to determine the source and chain of custody of tin, tantalum, tungsten and gold. Relevant due diligence procedures include, but are not limited to the following.

- Suppliers must adopt a conflict minerals policy that is consistent with the Code and the OECD Guidance. Suppliers must distribute their conflict minerals policy to all of their subcontractors and suppliers that provide materials for the manufacture of Goods.
- Suppliers must map their supply chain back to the point at which the metal was refined by the mineral processor (typically a smelter or refiner). This must be reported to AAC annually by completing the EICC Conflict Minerals Reporting Template to identify the smelters and refiners and, where available, country of origin of the tin, tantalum, tungsten, or gold used by the Supplier. This report must include complete information with respect to all of the Supplier's subcontractors and suppliers. Any changes affecting the information disclosed in the EICC Conflict Minerals Reporting Template within the regular annual reporting period must be promptly reported to AAC.
- Suppliers must only source tin, tantalum, tungsten or gold, and products and materials containing such metals, from smelters that have been validly certified as "conflict-free" by the EICC Conflict-Free Smelter program.
- Suppliers must notify AAC of all failures to meet these due diligence requirements, including, without limitation, any delay in providing the completed EICC Conflict Minerals Reporting Template on a timely basis.