

CONFLICT MINERALS POLICY

1.0 Scope/Objective

This policy defines Litron's activities to comply with the Conflict Materials provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 (Conflict Minerals Act).

1.1 Scope of Use and Responsibility: Litron, Inc. manages the due diligence activities required of a downstream company for applications listed below for which Litron is the procurer of record. Where Litron's customer is the procurer of record (with parts shipped either by the customer or drop shipped by their vendor to Litron for assembly) it is the responsibility of Litron's customers to maintain due diligence activities.

1.1.1 Gold used for Aerospace Electronic Package plating services performed at Litron or outsourced to a sub-tier special processor for plating;

1.1.2 Tin used for Electronic Packaging integration services performed at Litron

1.1.3 Electronic feed-thrus and connectors for Aerospace Electronic Packages and Medical Devices where gold-plate is required.

2.0 Definitions

2.1 EICC: Electronic Industry Citizen Coalition

2.2 Conflict Minerals: Columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted), cassiterite (the metal ore from which tin is extracted), wolframite (the metal ore from which tungsten is extracted), gold, or their derivatives; or any other mineral or is derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo or adjoining country.

2.3 Downstream companies: Companies in the supply chain that, for purposes of conflict mineral disclosure and reporting, procure conflict minerals or their derivatives from other companies, including material producers and, part and component manufacturers, raw materials, parts, and components from other companies.

2.4 Due Diligence: Conduct that conforms to a nationally or internationally recognized set of standards or guidance.

2.5 Upstream companies: Companies in the supply chain that, for purposes of conflict mineral disclosure and reporting, supply conflict minerals or their derivatives to other companies, including mines and smelters

3.0 LITRON CONFLICT MINERALS COMPLIANCE POLICY

Litron, Inc. is committed to complying with legislation and aligning with customer requirements relating to conflict minerals. We take careful measures to avoid purchasing metals that are directly or indirectly associated with human rights violations or environmental damage in the Democratic Republic of Congo and its neighboring countries. To this end, Litron will only procure metals from downstream suppliers that are able to demonstrate the sourcing of metals that are either outside the Conflict Region, or have been certified by an independent third party as Conflict Free.

4.0 Responsibility

4.1 Quality Assurance is responsible for the maintenance of this policy and the execution of all due diligence activities necessary to confirm downstream suppliers are complaint to this policy.)

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- 4.2 Purchasing is responsible for ensuring the exclusive use of downstream companies (as documented on Litron's ASL) that have documented compliance to this policy.
- 4.3 Litron suppliers that provide parts or products as defined in scope section 1.1 of this policy shall define, implement, and communicate to Litron their own Conflict Minerals Policy, outlining their commitment to responsible sourcing and measures for implementation. Suppliers shall work with sub-tier suppliers to ensure traceability of these metals to the smelter level. Litron encourages the use of the EICC/GeSIDD declaration and smelters documents as a means to communicate this information within the supply chain.

5.0 Supply Chain Approval and Due Diligence

5.1 Supply Chain Approval

Upon initiation of supplier approval activities as documented in Litron's PR7.4 Purchasing Procedure and Supplier Manual, suppliers identified as providing parts and products as defined in scope section 1.1 of this policy are provided with a copy of this policy and instruction to provide documentation supporting the requirements of section 4.3 of this policy. A supplier may not be added to Litron's ASL until such time as they have provided evidence that supports conflict-free sourcing.

- 5.1.1 Upon receipt of smelter listings, Litron QA will verify through EICC that the reported smelters are listed with the EICC as conflict-free. If not listed with the EICC, Litron QA request further evidence that the smelter's mineral sources are located outside of the conflict region or have received third-party certification as conflict-free.

5.2 Due Diligence

Quality Assurance is responsible for reviewing new supplier evidence of compliance to conflict-free sourcing. Once per year Quality Assurance will contact all suppliers approved for conflict minerals compliance (as documented on the ASL) to request renewal of their compliance documents. Any supplier that does not provide compliance evidence within 60 days of the request is suspended from use until compliance evidence is provided.

6.0 Purchasing Process

- 6.1 Parts and products as defined in section 1.1 of this policy are to be purchased only from suppliers whose scope of approval on the ASL includes conflict minerals compliance.

7.0 Verification of Purchased Product

- 7.1 At receiving inspection, quality control will review the CoC and any associated raw material certifications. The inspector will check the ASL to ensure that the parts or product originated from a supplier that is currently conflict mineral compliant. In the event that the supplier is not on the ASL, or not currently conflict mineral compliant, the parts and/or product is immediately moved to quarantine.
- 7.2 Quality Assurance will initiate corrective action through Litron's PR8.5.2 (Corrective and Preventive Action Procedure) in the event that materials are sourced from non-compliant suppliers.



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