

 CESARONI TECHNOLOGY INCORPORATED	<h1>Conflict Minerals Policy</h1>	
	Process Owner: Gordon Clarke	Version 1.00
Document #: CTI-ADM-POL-009	Status: Issued	Last Amended: 2020-01-17
Location: CTI Policy Manual		Page 1 of 1

The United Nations has found that the trade of certain rare earth minerals is helping to finance the civil conflict in the Democratic Republic of the Congo (“DRC”), characterized by extreme levels of violence. These minerals are commonly referred to as “3TG” (tin, tantalum, tungsten, & gold).

Cesaroni Technology Incorporated (“CTI”) is committed to responsible sourcing of 3TG. Cesaroni Technology Incorporated embraces due diligence and reporting processes that seek to ensure supply chain transparency by obtaining 3TG country of origin and other information from all suppliers directly managed or sourced by CTI.

CTI does not directly source 3TG from mines, smelters or refiners, and is in most cases several or more levels removed from these market participants. CTI, therefore, expects all suppliers to assist us, by declaring any components, parts, and products that contain 3TG and further providing associated country of and other origin information. In addition, CTI expects our suppliers to implement controls on their supply chains, so that they are able to provide us with this information and so that all of the 3TG in the components, parts, and products that we purchase from them are "conflict free". Suppliers who supply components, parts or products containing 3TG are expected to source those minerals from responsible sources that do not directly or indirectly contribute to conflict.

Without limiting the foregoing, suppliers are expected to, directly and indirectly, source 3TG only from sources that do not directly or indirectly benefit or finance armed groups in the DRC or another country covered by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Among other things, we expect our suppliers to, where possible, source 3TG from smelters and refiners that are validated as being conflict free and otherwise implement, and require their direct and indirect suppliers to implement, policies, protocols, standards, systems, frameworks and procedures that are consistent with the Rule and the Organization for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Suppliers who do not comply with these expectations will be reviewed and evaluated accordingly for future business and sourcing decisions.

We have mechanisms for employees, suppliers, and other interested parties to report violations of our Conflict Minerals Policy. The Conflict Minerals inquiry email address is: regulatory@cesaroni.net.