

Conflict Minerals Policy

June 2021

1. PURPOSE

This policy provides a framework through which EA shall comply with Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act pertaining to Conflict Minerals. 2.

2. SCOPE

On August 22nd, 2012, the U.S. Securities and Exchange Commission (“SEC”) published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act (“Act”) governing Conflict Minerals. The Act requires companies to perform due diligence on the source and chain of custody of Conflict Minerals contained in their products.

The primary minerals and metals that could potentially come from conflict mines are:

- Cassiterite (tin)
- Gold
- Cobalt
- Coltan (niobium and tantalum)
- Wolframite (tungsten)
- Pyrochlore (niobium)

3. DECLARATION

3.1. Excel Assemblies strives to have a Conflict Free supply chain, and is committed to sourcing products and materials from non-conflict sources whenever this is possible given the facts Excel Assemblies performs only assembly of the purchased parts (catalogue items) as per AVL that is in customers ownership, thus are not effected by the Conflict Minerals regulations.

3.2. EA expects that its suppliers that have been nominated through BOM and drawings by EA final customers, have due diligence processes in place to identify the source of the Conflict Minerals contained in their products, and that those sources do not support conflict and violations of human rights;

3.3. To further the benefits of Section 1502 and promote its intended purpose, EA will work with suppliers with underdeveloped processes, providing information and guidance in an attempt to increase supply chain transparency throughout the world and into the DRC and surrounding region. EA and its suppliers do not knowingly use any virgin tin or gold obtained from conflict mines (and only as terminal plating) and will regularly query suppliers to verify our requirements are being met to help ensure the health and safety of all workers in our supply chain.

Sincerely,

Davor Presker
Excel Assemblies Quality Manager