



CONFLICT MINERALS POLICY

It has become apparent to the world that the mining of certain minerals may be financing armed groups engaged in violence, human rights violations and environmental degradation in the eastern portion of the Democratic Republic of Congo (DRC) and surrounding countries. These minerals, known as "Conflict Minerals" include the ores which are refined into **tantalum, tin, tungsten** and **gold**. In order to curtail these social and environmental abuses the U.S. Securities and Exchange Commission (SEC) adopted Conflict Minerals provisions in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. All U.S. publicly traded companies are presently required to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals and to report on the due diligence measures they have taken to determine the source of those minerals. Leading Edge Manufacturing is not directly subject to the requirements of Section 1502, however many of our valued customers must satisfy the disclosure requirements of this law. As an integral member of their supply chains we recognize as paramount our obligation to meet their needs. Furthermore, Leading Edge Manufacturing is committed to social responsibility and to ethical business practices; so our objective to promote a conflict-free supply chain is clear.

CONFLICT MINERALS COMMITMENT

- We will disclose to our Customers sourcing information using the EICC-GeSI Conflict Minerals Reporting Template or other similar template that traces the Conflict Minerals used in the products that we supply to them back through the supply chain.
- We will work closely with our suppliers to understand, to the greatest extent possible, the sources of the Conflict Minerals contained in the products they supply to us and to encourage that Conflict Minerals only come from Conflict Free Sources.
- We expect our suppliers to adopt policies consistent with the SEC's Conflict Minerals provisions and that they will put in practice steps to ensure that the minerals they include in their products are responsibly sourced.
- We will require each supplier to Leading Edge Manufacturing that provides products that include Conflict Minerals to submit their sourcing information using the EICC-GeSI Conflict Minerals Reporting Template or other similar template that traces the metals back through the supply chain.
- If we become aware of a supplier whose supply chain includes Conflict Minerals from a Conflict Source, we expect to take the appropriate action to remedy this situation in a timely manner, including reassessment of supplier relationships.
- We expect our suppliers to take similar measures with their suppliers to ensure a consistent policy alignment throughout the supply chain.
- We will conduct a yearly audit of any supplier providing us with products sourcing Conflict Minerals to ensure that all products we utilize are from Conflict Free Sources



CONSEQUENCES OF SUPPLIER NON-CONFORMANCE

We reserve the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

We reserve the right to request additional documentation from our suppliers regarding the origin of any Conflict Minerals included in any products sold to us.

Suppliers who do not reasonably comply with this Policy shall be reviewed by our purchasing department for future business.

In the event that we determine that a supplier's efforts to comply with this Policy has been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, we reserve the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Nothing in this Policy is intended to in any way grant any additional rights or expectations to our suppliers or in any way modify or otherwise limit in any way any of our contractual or legal rights.

CONCLUSION

We fully understand the importance of this issue to our customers and are committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a DRC Conflict Free supply chain. We encourage all of our suppliers to likewise support these efforts.