



CONFLICT MINERALS POLICY

For years, the mining and sale of certain minerals in the Democratic Republic of the Congo (DRC) and adjoining countries have helped fund conflicts contributing to an emergency humanitarian situation. Conflict Minerals are minerals mined in conditions of armed conflict and human rights abuses, by various armed rebel groups. The profits from the sale of these minerals finance continued fighting in the ongoing wars. These minerals include Cassiterite (tin), Wolframite (tungsten), Coltan (tantalum), and Gold. These minerals have become known as 3TG. In an effort to stop the exploitation of these minerals, the Dodd-Frank Wall Street Reform and Consumer Protection Act includes Section 1502 Conflict Minerals. This section requires changes to the Securities Exchange Act of 1934 to include requirements for disclosures relating to conflict minerals originating in the Democratic Republic of the Congo (DRC). Identifying these minerals and their source will help de-fund the armed groups creating the humanitarian emergency in the DRC.

ALL Circuits manufacture products that contain anyone of the 4 minerals (tin, gold, tantalum, tungsten) in them, so ALL Circuits has actions as a result of the Conflict Minerals section of the Dodd-Frank Act. These actions could range from completion of template to report Conflict Minerals information. Of course, like RoHS and REACH and any number of other regulations, ALL Circuits may not be subject to the regulations specifically, but ALL Circuits will be involved in supply chain actions. Some of our customers will want information about the conflict minerals status of the parts they buy. ALL Circuits will probably be involved in someone's due diligence, and may be required to identify DRC Conflict Mineral parts, and other supply chain considerations.

ALL Circuits supports the ending of human rights violations and violence in the Democratic Republic of Congo (DRC) and the surrounding countries. ALL Circuits is committed to fulfilling the needs of our customers by providing a complete Electronic Industry Citizenship Coalition conflict minerals report upon request. ALL Circuits does not directly purchase any Conflict Minerals from any source and does not knowingly procure any product containing Conflict Minerals from the Conflict Region. To the extent that ALL Circuits' value-added services offering may include the manufacture of various products that contain "Conflict Minerals" that are necessary to the functionality or production of the product, ALL Circuits is committed to working with its supply chain to increase transparency regarding the origin and traceability of minerals contained in products. ALL Circuits's due diligence is based on those described in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We encourage our suppliers to adopt similar policies and management systems with respect to Conflict Minerals and to drive those efforts throughout their supply chain to ensure that the specified metals are being sourced only from mines and smelters outside the "Conflict Region" or mines and smelters within the Conflict Region which have been certified by an independent third party as "conflict free."

Meung-sur-Loire, on 06/16/2022
Patrick Lebossé
ALL Circuits Purchasing Director

