

Dodd-Frank Street Reform and Consumer Protection Act Policy (Conflict Materials)

Background

In 2010, Congress enacted the Conflict Minerals provisions of the <u>Dodd-Frank Street Reform and Consumer Protection</u> <u>Act</u> with the goals of eliminating the illegal trade in Gold, Tin, Tantalum and Tungsten (Conflict Minerals) and cutting the funding of armed groups in the Democratic Republic of the Congo (DRC) and its neighboring countries (Angola, Burundi, Central African Republic, The Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia) that are engaged in human rights abuses. Section 1502 of the Dodd-Frank Act requires public traded companies to report to the U.S. Securities and Exchange Commission (SEC) and disclose on their website whether any of the Conflict Minerals in the products they manufacture or contract to manufacture originate in the DRC Region and the due diligence conducted to determine if the original sale of the mineral funded armed conflict. The SEC issued implementing regulations and <u>guidance</u> on August 22, 2012.

Peter Paul Electronics Commitment to Responsible Sourcing

Peter Paul Electronics has built a legacy of operating and sourcing in an ethically and socially responsible manner. Today, Peter Paul Electronics continues to be committed to ensuring our principles are honored in all of our business decisions. Peter Paul Electronics is dedicated to preventing the sale of products produced at the expense of communities, workers or the environment. We are committed to sourcing materials from companies that share our values around human rights, ethics, and social and environmental responsibility.

Peter Paul Electronics fully supports the humanitarian goals of the Dodd Frank Act – eliminating illegal mineral trading and the funding of armed conflict while supporting legitimate commercial ventures. Peter Paul Electronics purchases raw materials that are not directly purchased from any Conflict Minerals source. Since the supply chain for Conflict Minerals is complex, we are committed to working with our supply chain to increase transparency regarding the origin and traceability of minerals contained in our products with the goal of ensuring that all products sold by Peter Paul Electronics to our customers are "DRC Conflict Free."

Peter Paul Electronics will be carrying out supply chain due diligence consistent with the OECD guidelines.

Peter Paul Electronics Expectations of Suppliers

Suppliers may not include in any products sold to Peter Paul Electronics any Tin, Tantalum, Tungsten or Gold mined in the Democratic Republic of the Congo or adjoining countries that fund armed conflict.

Suppliers are required to develop Conflict Minerals policies, due diligence frameworks, and management systems, consistent with the Organization for Economic Cooperation and Development (OECD) guidelines_and to drive those efforts throughout their supplier chain.

Suppliers of certain Peter Paul Electronics materials will be required to provide written evidence of due diligence documentation.

To the extent available, Suppliers must use EICC-GeSI designated Conflict-Free Smelters as the source for any of the Conflict Minerals used in the materials sold to Peter Paul Electronics.

Paul J. Molinari Director QA & Compliance

File: G:\PPE\HSE\Environmental\Conflict Materials\PPE Conflict Minerals Policy.doc