

November 18, 2019

Conflict Mineral Policy Statement (Reference: W-4-104)

APT Electronics Inc. (APT); a privately held company, is committed to ensuring that our sources of supply, to the best of our ability, provided components and products that are Democratic Republic of the Congo conflict-free and to support our customers due diligence programs. APT shall use reasonable efforts to comply with all applicable Conflict Minerals laws identified in Section 1502 of the Dodd-Frank Act in support of our customers who must comply with SEC Conflict Minerals Rules.

Policy Perspective

APT Electronics, Inc. opposes and condemns the Democratic Republic of Congo (DRC) Conflict Perpetrators, their perpetrating conduct, and the adverse consequences that conduct imposes on the people and environment of the DRC Region. APT supports goals, laws and initiatives that effectively (1) respect and protect human rights and the environment, (2) foster supply chain integrity, ethics, compliance, accountability and sustainability, and (3) oppose, condemn, stop, eliminate, reduce, isolate, identify and penalize DRC Conflict Perpetrators.

APT requires that its Suppliers, Upstream Suppliers, and Contract-Manufacturers take measures to comply with all applicable Conflict Minerals laws and regulations, and take measures to eliminate and verify the elimination of DRC Targeted Conflict Minerals and their Common Metal Derivatives from all products purchased by APT including Electrical Components, Electro-Mechanical Components, and Mechanical Components.

Conflict Minerals Laws Compliance


APT expects all Suppliers, to comply, use reasonable efforts to comply, and not misrepresent their compliance or efforts to comply with all applicable Dodd-Frank Act Conflict Minerals laws and the SEC Conflict Minerals Rules, as well as with their own Conflict-Minerals-related policies, contractual duties, disclosures, industry/framework pledges and other legal obligations.

APT has the reasonable expectation that when a Customer supplies product, materials or other property for inclusion in the product to be produced by APT that it complies with all applicable Dodd-Frank Act Conflict Minerals laws and SEC Conflict Minerals Rules.

Conflict Minerals Categories and Process Requirements

APT will require reasonable steps be taken by its direct and indirect suppliers, through or on behalf of APT to reasonably and verifiably determine, identify and document, on a Timely Basis and with Reasonable Country of Origin Inquiry and other applicable Due Diligence, each Electrical Component, Electro-Mechanical Component, and Mechanical Component supplied to APT as: “Conflict-Free” or “DRC Conflict Undeterminable” or “Contains Targeted DRC Conflict Minerals and/or Metal Derivatives”

APT will require its direct and indirect suppliers provide APT (including its relevant subsidiaries, affiliates, auditors, consultants and other service providers) access and permission to access reasonably-requested relevant information, documents, audit data, reports, certifications and other records which pertain to or evidence APT produced products or components. APT’s direct and indirect suppliers shall comply with this policy, applicable Conflict Minerals laws, applicable SEC Conflict Minerals Rules, and its own relevant Conflict Minerals policies, commitments, industry/framework pledges, statements, practices, procedures and programs.



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