

Date: May 2020

Gidel Conflict Minerals Policy

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) was signed into U.S. law in July 2010. Section 1502 of the Dodd Frank Act requires the Securities and Exchange Commission to establish rules requiring disclosure and reporting procedures of the purchase and use of Conflict Minerals from the Democratic Republic of the Congo and the adjoining countries (Conflict Region). Conflict Minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold (3TG).

As a part of the company's values to undertake manufacturing practices that are environmentally and socially beneficial, Gidel supports the Dodd-Frank Act initiative and is taking steps to implement it by requiring its suppliers to exercise reasonable inquiry with their supply chain to assure that materials and components supplied do not contain conflict minerals that originate from mining or smelting operations in the Conflict Regions. With Suppliers who do not meet the "conflict free" requirements, Gidel will either take cooperative corrective actions or terminate relations with the supplier.

Gidel maintains a Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. To view Gidel's entire supply chain smelter list, Gidel provides access to its suppliers' CMRTs declaration. For access to the Gidel database, please contact the Gidel Support (support@gidel.com).

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