



## SMC Aerospace Policy Regarding Conflict Metals

Conflict Materials are defined as **tin, tantalum, tungsten**, and/or **gold** (whether in raw or processed form, or combined with other materials), Seller hereby certifies that such metals have not been sourced in a manner which directly or indirectly finances or benefits armed groups in the Democratic Republic of the Congo or adjoining countries (**Sudan, Uganda, Tanzania, Angola, Zambia, Rwanda, Burundi, Central African Republic, Congo Republic**).

In addition, Seller shall have and implement its own Conflict Mineral Policy which at a minimum be aligned with buyer's policy (stated above), and shall include a commitment to legal compliance and shall be communicated to Seller's suppliers. Seller shall ensure that purchased tin, tantalum, tungsten, and/or gold originate from smelters validated/certified by third parties in accordance with procedures adopted by the Electronic Industry Citizenship Coalition as being conflict mineral free. Seller shall work with sub-suppliers to ensure traceability of these metals within their products, back down to smelter and mine. **Traceability data shall be maintained and recorded for 5 years.** Documentation shall be provided to Buyer upon request.

SMC Aerospace, as a privately held corporation, is not subject to Conflict Materials reporting requirements directly, however we shall flow-down the requirement (Item #28) on all purchase orders for material, castings, forgings and any process or product regarding Conflict Metals: (Reference SMC 6-1A Purchasing Flow down Form, Rev 16 10/4/17) SMC is committed to supporting responsible sourcing of its materials from suppliers that share our values around human rights and environmental responsibility

Supplier must include on their Certificate of Authority and/or Certificate of Conformance that material, processes and product included in this order are conflict mineral free. In addition to the foregoing commitments, we expect our suppliers to perform similar due diligence on the sources of Conflict Minerals in their respective supply chains and make their findings available to us.

**Reference:** The U.S. Conflict Minerals Law (Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) became effective on August 22, 2012. The law defines conflict minerals as certain minerals originating from the Democratic Republic of the Congo (DRC) or adjoining countries. Regulations have been implemented regarding the law and SEC registered companies are required to report the use of any conflict minerals/Metals originating from the DRC or adjoining countries. SMC Aerospace is not an SEC registered company however many of SMC Aerospace customers are SEC registered. Therefore, SMC Aerospace and sub-tiers may be subject to third party audits to verify compliance.

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