

On July 21, 2010 President Obama signed into law the Dodd-Frank Wall Street Reform and Consumer Protection Act (Wall Street Reform Act). As a part of the Wall Street Reform Act which regulates for the first time "conflict minerals." And in support of our customers, this disclosure declares all Sullins products were produced free of conflict minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC is developing regulations to implement these "conflict mineral" requirements, which initially apply to tin, tantalum, tungsten and gold. While we can't be certain what the new regulations will require when published, based on the legislation, we know that Sullins will have to provide a description of the measures we take to exercise due diligence on the procurement sources and chain of custody of such minerals Accordingly, we expect our suppliers to:

- 1. Have a publicly available conflict-mineral policy.
- 2. Identify and verify their sources of tin, and gold incorporated into products sold to Sullins are conflict free.

Pursuant to tracing our supply chain, Sullins declares the following information:

 A smelter/refinery is a company that procures and processes mineral ore and/or slag into refined metal. Sullins requests that our suppliers confirm the smelters/refineries used in supplying products sold to Sullins. Sullins supply chain has provided information and material declarations by reviewing to the requirements and utilizing the EICC smelter/refinery table as shown below. The confirmations to the smelter/refinery has been performed by Sullins and is in compliance to the EICC listed smelter/refinery table

Mineral	a) Mineral contained in Sullins supplied products? Yes/No	b) Smelter/Refinery on list in Appendix A? Yes/No	If No to b), Please provide Smelter/Refinery information in next section
Tin	Yes		
Tantalum	NA		
Tungsten	NA		_
Gold	Yes		
Cobalt	NA		



- 2. For smelters/refineries not listed we have asked our suppliers to provide information in the following format. The information contained is only provided as an example.
 - **a.** If our supplier is sourcing Gold from an exchange, bank, or trader, we also need them to provide the smelter/refinery name, address and contact name, email and phone number.

Mineral	Company Product Supplied to Industry (Examples below)	Mine of Origin / Region, Country of Origin	Smelter/Refinery Name & Address	Smelter/Refinery Contact (Name, Email and Phone #)
Tin	Solders	Mine D / Region, Country	Smelter A	
Tantalum	Capacitors	Mine C / Region, Country	Smelter B	
Tungsten	Integrated Circuit	Mine X / Region, Country	Smelter E, Smelter F	
Gold	Wire/Plating	Mine Y / Region, Country	Refinery L	
Cobalt	Integrated Circuit	Mine E / Region, Country	Smelter C, Smelter D	

Sullins ultimately expects its suppliers to undertake reasonable due diligence with their supply chain to assure that these minerals are not being sourced from mines in conflict areas which are controlled by non-government military groups, or unlawful military factions ("Conflict Minerals"). The Electronic Industry Citizenship Coalition (EICC) table, was utilized in preparation of this declaration. Tin and gold are the only minerals procured that are applicable to Sullins delivered products.

If you have questions about this request or the requirement, please do not hesitate to contact <u>dheadding@sullinscorp.com</u>.

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APPEND	APPENDIX A – EICC Smelter Lists				
Metal	Smelter	Country			
Tin	PT Timah	Indonesia			
Tin	Minsur	Peru			
Tin	Malaysia Smelting Corp	Malaysia			
Tin	Thaisarco	Thailand			
Tin	EM Vinto	Bolivia			
Tin	Metallo Chimique	Belgium			
Tin	PT Koba Tin	Indonesia			
Tin	Taboca/Paranapanema	Brazil			
Tin	OMSA	Bolivia			
Tin	PT Bangka Putra Karya	Indonesia			
Tin	CV DS Jaya Abadi	Indonesia			
Metal	Smelter	Country			
Tantalum	Ningxia	China			
Tantalum	HC Starck	Germany			
Tantalum	Niotan	USA			
Tantalum	F&X	China			
Tantalum	Zhuzhou	China			
Tantalum	Posco	Korea			
Tantalum	Takei Chemicals	Japan			
Tantalum	Solikamsk	Russia			
Tantalum	Exotech	USA			
Metal	Smelter	Country			
Tungsten	Global Tungsten & Powders Corp	USA			
Tungsten	HC Starck GmbH	Germany			
Tungsten		China			
_	Jiangxi Rare Earth Metals Tungsten Group Corp				
Tungsten	Jiangxi Tungsten Co Ltd	China			
Tungsten	Xiamen Tungsten Co Ltd	China			
Metal	Smelter	Country			
Gold	Timah Company	Indonesia			
Gold	Wuxi Middle Treasure Materials	China			
Gold	Suzhou Xingrui Noble	China			
Gold	AGR Mathey	Australia			
Gold	Harmony Gold Refinery	South Africa			
Gold	Johnson Matthey Inc	USA			
Gold	Metalor USA Refining Corporation	USA			
Gold	Metalor Technologies SA	Switzerland			
Gold	Western Australian Mint trading as The Perth Mint	Australia			
Gold	Johnson Matthey Limited	Canada			
Gold	Royal Canadian Mint	Canada			
Gold	W.C. Heraeus GmbH	Canada			
Gold	Heraeus Ltd Hong Kong	Hong Kong			
Gold	Metalor Technologies (Hong Kong) Ltd	Hong Kong			
Gold	Asahi Pretec Corp	Japan			
Gold	Ishifuku Metal Industry Co. Ltd	Japan			
Gold	JX Nippon Mining & Metals Co Ltd	Japan			
Gold	Matsuda Sangyo Co.,Ltd	Japan			
Gold	Mitsubishi Materials Corporation	Japan			
Gold	Sumitomo Metal Mining Co Ltd.	Japan			
Gold	Tanaka Kikinzoku Kogyo K.K.	Japan			
Gold	LS-Nikko Copper Inc	Korea			
Metal	Smelter	Country			



Cobalt	Heraeus	Finland
Cobalt	Nikkelwerk	Finland
Cobalt	Sumitomo	Japan
Cobalt	Shanghai Xinbao Co	China