



HARTWELL CORPORATION

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Conflict Minerals Policy

There has been increased awareness of violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. Companies around the globe have been requested to practice reasonable due diligence with their supply chain to assure that specified metals are not being sourced from mines in the Conflict Region, which is controlled by non-government military groups, or unlawful military factions.

Hartwell supports this initiative and has either obtained, or is in the process of obtaining, information from our current suppliers concerning the origin of the metals that are used in the manufacture of Hartwell products. Based upon information provided by our suppliers, Hartwell does not knowingly use metals derived from the Conflict Region in our products.

Suppliers of metals used in the manufacture of Hartwell products (specifically gold, tin, tantalum, and tungsten) must demonstrate that they understand the conflict minerals laws and will not knowingly procure specified metals that originate from the Conflict Region.