

In 2010, the Dodd-Frank Act became law. Section 1502, of the Act, requires publicly traded US companies to disclose the use of 'conflict minerals' required for the functionality of their products. Conflict Minerals come from the Democratic Republic of Congo ("DRC") and adjoining countries and include Tin, Tungsten, Tantalum and Gold ("3TGs"). The mining of these minerals has been partially coopted by militant groups which engage in human rights abuses to mine these materials and use the proceeds to finance armed conflict in the region.

Consistent with our belief in the dignity of, and respect for, individuals, as demonstrated in our policies on labor practices, **SpecTech USA** (the "Company") is concerned with the humanitarian abuses involved in the mining of these materials and subsequent financing of armed conflict and takes its obligations under Section 1502 of the Dodd-Frank Act seriously. As such, the Company strives to deliver products to its consumers that are produced / sourced in an ethical way consistent with our beliefs and to be compliant with the laws in the countries in which we operate. The Company does not directly source conflict minerals from mines, smelters, or other refiners, and is in most cases several levels removed from these market participants.

The Company continues to strive towards a supply chain that contains minerals that are conflict-free and seeks to source from responsible conflict-free zones.

To enable our commitment to responsible conflict minerals sourcing, the Company has adopted the following practices:

- Instituted an assessment of its supply chain to identify areas where there is a high probability of 3TG use;
- Collaborate with suppliers to confirm 3TG usage and potential sources of these minerals;
- Make available the conflict minerals policy to all new and current suppliers; and
- Expects its suppliers to adopt policies with respect to conflict minerals consistent with the Company's stance.
- Develop and implement systems and processes to understand level of conflict mineral risk in the supply chain and take appropriate action where deemed necessary.
- Auditing, performed by our Internal Audit team, of our processes as part of our normal internal controls process by our Internal Audit team; and

The Company reserves the right to request information, certifications, and documentation from any supplier at any time as it shall deem necessary to monitor or assess compliance with this policy. The Company seeks to work with suppliers who will share its commitment in working towards compliance with this policy.