



## **Pivot-EDM Conflict Minerals Policy**

In 2012, the U.S. Securities and Exchange Commission (SEC) issued the final conflict minerals rule under the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Conflict Minerals Rule), which requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum and gold, or “3TG”) originating in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”).

Pivot-EDM, Inc. (EDM) does not directly source any of these minerals. We do, however, procure electronic assemblies and components, containing these minerals that are necessary to the functionality and production of our customer specified products. We fully support the objectives of this legislation, which aims to minimize violence and environmental damage in the DRC Region, and will assist our customers in implementing their conflict minerals programs. EDM is committed to ethical practices and will work cooperatively with both customers and supply chain partners to ensure compliance with applicable laws and regulations wherever it does business.

EDM undertakes reasonable due diligence with our supply chain to assure that specified metals are being sourced only from:

- Mines and smelters outside the “Conflict Region” or
- Mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”

Due diligence includes procuring policy statements and written evidence documenting that raw materials used in the materials to manufacture components and products supplied are in line with the requirements outlined in this policy. EDM will assess future business with suppliers who are noncompliant.