



Conflict Minerals Policy

Minerals mined in the Democratic Republic of Congo (DRC) and adjoining countries may be making their way into the electronics industry supply chain. As part of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange Commission (SEC) passed legislation which requires certain U.S. companies to report on the origin of these conflict minerals including tin, tantalum, tungsten and gold.

Laird and its subsidiaries are committed to ethical practices and compliance with all applicable laws and regulations. While we do not knowingly source these metals directly, they may exist in the materials and components we source. We are therefore committed to working with our customers and suppliers to responsibly source the materials and components we use in manufacturing our customers' products, which may contain these minerals.

In order to comply with the above regulations relating to conflict minerals, Laird requires written evidence of Supplier due diligence, documenting efforts to determine that **3TG** materials (specifically gold, tin, tantalum, and tungsten) used in the manufacture of Laird products do not originate from mining or smelting operations in the Conflict Region that contribute to violence and choose to not cooperate with CFSI or other third party validation. Laird requires our suppliers to source 3TG materials from smelters whom have been validated as conflict free by an independent third party audit program.

In addition, we require the following from our suppliers:

- A written mitigation plan to source materials from socially responsible sub-tier suppliers and manufacturers, if current supplier base is not compliant
- To assist in complying with regulations related to conflict minerals and to provide all necessary declarations
- To undertake reasonable due diligence within their supply chain to determine the origin of the conflict minerals, including developing policies and management systems preventing the use of conflict minerals or derivative metals sourced from mines that directly or indirectly finance armed groups through mining or mineral trading in the DRC or any adjoining country
- To pass these requirements along to their sub-tier suppliers, requiring them to do the same due diligence activities with lower tiers of suppliers.

Regarding our Customer Facing segment, we request the following support from our customers:

- To design-in components that can be sourced from socially responsible suppliers
- To assist in complying with regulations related to conflict minerals
- To assist in gathering declarations where the supply chain has been established by our customer
- To support supply chain changes required to eliminate DRC conflict minerals from the products

In addition, we will work with our suppliers and also our customers, where the supply chain has been established by our customer, to seek remedies for non-compliance.

The process of tracing the conflict minerals through the supply chain is complicated and time-consuming. Therefore, we will rely on industry initiatives, such as the Conflict Free Smelter Program, for assistance in complying with any reporting requirements on conflict minerals.

Laird is committed to working with our customers and our suppliers to ensure effective implementation of this policy.

Graeme Watt

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Chief Risk and Assurance Officer

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