

Corporate Policy for Sourcing Conflict-free Minerals

The mining and distribution of “conflict minerals¹” originating from the Democratic Republic of the Congo (the “DRC”) are sometimes controlled by violent organizations in order to fund conflict in that country and adjacent regions. Our industry supply chains are inadvertently subject to metals derived from these conflict minerals which can be introduced through the metals we use such as **gold, tin, tantalum and tungsten** (said 3TG) and **cobalt**.

The Asteelflash Group and all its subsidiaries are dedicated to the elimination of these conflict minerals in our supply chain and to using only responsibly sourced conflict-free minerals². We expect our suppliers to source conflict-free minerals from smelters or refineries that have been certified by an independent third-party audit program to fulfill our objective. It is also our objective to support the continued use of conflict-free minerals from the DRC and its adjacent regions such that responsible mining is not diminished. We exercise due diligence with our suppliers on the origin and supply chain of minerals in accordance with the “OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” to establish conflict minerals management mechanism.

All suppliers to Asteelflash must support this policy by:

- \\ being diligent in their assessment and validation of their supply chains to ensure Asteelflash’s objectives of a transparent supply chain, and conflict-free purchases as inputs to the services and products we produce
- \\ at all times be in compliance with all regional and international regulations for conflict minerals
- \\ at all times be in compliance with industry standards for the sourcing and reporting of conflict minerals
- \\ being diligent and accurate in their formal assurances of conflict-free minerals provided to us.

¹ Conflict minerals include columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives as defined in the Dodd-Frank Act section 1502 and SEC Rule 13p-1 under the Securities Exchange Act of 1934.

² Conflict-free minerals are conflict minerals that through their distribution directly or indirectly DO NOT benefit violent organizations in the Democratic Republic of Congo, its adjacent regions, or any other conflict region in the world.