

### ControlTek's Conflict Mineral Policy

In July 2010, President Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. Although the focus of the Act is financial market regulatory reform, it also imposes new requirements relating to "Conflict Minerals." Specifically, section 1502 of the Act imposes Securities and Exchange Commission (SEC) reporting requirements upon publicly-traded companies whose products contain metals derived from minerals defined as "Conflict Minerals," which include tantalum, tin, tungsten and gold.

The new reporting requirements reflect congressional concerns that revenues obtained from the mining and transportation of "Conflict Minerals" could be used against the desire of the U.S. and its allies to finance the ongoing conflict in the Democratic Republic of Congo (DRC) and surrounding countries resulting in a humanitarian crisis. On August 22, 2012 the Securities and Exchange Commission (SEC) published the regulations implementing the conflict minerals reporting obligations of section 1502.

ControlTek does not purchase tin, tantalum, tungsten, or gold (3T&G) (which may be necessary for assemblies manufactured by ControlTek) directly from smelters or mines. Further, there are many supply chain layers that separate ControlTek from the smelters and mines from which these metals are sourced. ControlTek has however, actively engaged with its supply chain to determine the level of conflict minerals in purchased materials (if any). While ControlTek is committed to assisting our customer's in their SEC conflict mineral reporting requirements, we are unable at this time to provide definitive evidence for all components, parts, or materials we purchase.

ControlTek is committed to helping prevent the use of DRC conflict minerals and will flow down this commitment to our supply chain. Suppliers are expected to ensure that parts, products and materials supplied to ControlTek are DRC conflict-free (do not contain metals derived from "conflict minerals"; columbite-tantalite (tantalum), cassiterite (tin) gold, wolframite (tungsten), or their derivatives such that they directly or indirectly finance or benefit armed groups through mining or mineral trading in the Democratic Republic of the Congo or an adjoining country). Suppliers are to establish policies, due diligence frameworks, and management systems consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk areas that are designed to accomplish this goal.