AIMTRON



Conflicts of Minerals Policy For Suppliers

AIMTRON CORPORATION

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Preface

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law. The Dodd-Frank Act and related 2012 U.S. Securities and Exchange Commission rules require certain companies that use conflict minerals defined as Tin, Tantalum, Tungsten and Gold (commonly referred as 3TG) in products to identify the country of origin of the source mine(s) of these metals used in making any product. Also, certain companies require to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals necessary for the production or the functionality of the products. An acceptable source of these metals is a smelter(s) validated as "conflict free" by an industry consortium such as the Conflict Free Sourcing Initiative (CFSI). Therefore, **AIMTRON CORPORATION** requires its suppliers to identify the source of 3TG minerals used in making raw materials or products to supply to AIMTRON CORPORATION.

This policy document explains the Conlificts of Mineral Policy of **AIMTRON CORPORATION**.

AIMTRON CORPORATION Philosophy | Conflicts of Mineral

We at AIMTRON CORPORATION is committed to support humanitarian goal and objective of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region. This Policy is set forth for AIMTRON CORPORATION's adherence and its expectations from its supply chain partners to address Conflict Minerals as per Dodd-Frank Act.

AIMTRON CORPORATION always acts in responsible manner, socially & environmentally complying with the law. This Policy document describes AIMTRON CORPORATION's commitment and expectations from its supply chain partners regarding Conflict Minerals.

This document represents a minimum standard of best practice.
AIMTRON CORPORATION is committed to support suppliers in achieving the expectations mentioned in this policy. Also expect their suppliers & business partners to flow down these expectations to the suppliers they work with in providing goods and/or services.

If you have any questions on this AIMTRON CORPORATION Conflicts of Mineral Policy for its Electronics Supply Chain Partners & other Suppliers or need to report a suspected or known violation or non-compliance to Dodd-Frank Act for Conflicts of Mineral, please contact: AIMTRON CORPORATION at 1-630-272-7500 or visit the AIMTRON CORPORATION website: www.aimtron.com

About AIMTRON CORPORATION

AIMTRON CORPORATION always acts in responsible manner, socially & environmentally complying with the law. The AIMTRON CORPORATION, LLC is focused on organizing opportunities for industry and relevant stakeholders to exchange information and best practices concerning government laws, ethical business challenges, practices and opportunities worldwide. The AIMTRON CORPORATION values business conduct as it relates to zero tolerance of corruption, use of advisors, management of conflicts of interest and respect for proprietary information.

AIMTRON CORPORATION expects suppliers, consultants, sales and service representatives, agents, distributors, and other business partners (collectively, "Business Partners") to conduct business in accordance with the highest ethical standards. AIMTRON CORPORATION, LLC's Business Partners are an extension of the company and must not conduct business in a manner that could damage AIMTRON CORPORATION's reputation or cause AIMTRON CORPORATION, LLC to be in violation of any law or regulation of Conflicts of Minerals regulations as per Dodd-Frank Act

Why Conflicts of Mineral Policy?

This Policy is set forth to comply with Conflict of Minerals as per Dodd-Frank Act and to it is to establish the framework & process for supply chain how to do business with AIMTRON CORPORATION. It is to summarize AIMTRON CORPORATION's expectation from the supply chain partners or other suppliers and business partners who act on its behalf

AIMTRON CORPORATION adheres and is committed to follow this Conflict Mineral Policy.

CONFLICT OF MINERAL POLICY

I. AIMTRON CORPORATION's Commitment

- AIMTRON CORPORATION supports the goals and objectives of the Dodd-Frank Act concerning Conflict Minerals sourcing & supplying.
- AIMTRON CORPORATION educate its supply chain partners or manufacturers of the products about Conflict Minerals as per Dodd-Frank Act.
- AIMTRON CORPORATION helps its supplier to understand steps they can take in tracing the source of any Conflict Minerals and obtain the transparency regarding the origin of minerals contained in the products they manufacture and supply to AIMTRON.
- AIMTRON CORPORATION does not source any product that contains Conflict Minerals
- AIMTRON CORPORATION does not source any products from the suppliers who fails to implement processes to Conflict Free sources.
- AIMTRON CORPORATION encourages its suppliers to adopt the same policy for their businesses
- As Electronic Manufacturing Service Provider, AIMTRON CORPORATION does not directly purchases any raw Conflict Material from any sources
- AIMTRON CORPORATION is aimed to working with its suppliers and educate them to get the transparency regarding the origin of minerals contained in the products they manufacture and supply to AIMTRON CORPORATION
- AIMTRON CORPORATION supports industry efforts to enhance traceability and responsible practices in Conflict Minerals supply chains

II. AIMTRON CORPORATION'S expectation from its suppliers

To compliment this policy, AIMTRON CORPORATION expects following from its suppliers.

- Suppliers should not supply any products with any Conflict Minerals that are not DRC Conflict Free
- Suppliers should develop Conflict Minerals Processes, Policies and Design Management systems that prevent Conflict Minerals that are not DRC Conflict Free.
- Suppliers are expected to source the material from the sources that are DRC Conflict Free.
- To inform AIMTRON CORPORATION that products which are supplied to AIMTRON CORPORATION are not DRC Conflict Free

- To source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free, and require their direct and indirect suppliers to follow the same
- To provide AIMTRON CORPORATION with information concerning the origin of Conflict Minerals used in material or products supplied to AIMTRON CORPORATION, which AIMTRON CORPORATION shall be entitled to use or disclose in satisfying any legal or regulatory requirements.
- To implement and communicate same polices to their direct and indirect suppliers and to establish a process for the traceability of Conflicts of Minerals with them as applicable.

III. Consequences for Non-Compliance

If the expectations of this policy are not met, the business relationship with the suppliers may be reviewed, and corrective action pursued subject to the terms of the related purchase(s) or contract(s.)

Also, AIMTRON CORPORATION reserves the right:

(a) To evaluate its business relationship with its suppliers on regular basis

(b) To evaluate If supplier has failed to comply with this Conflict of Minerals Policy

(c) To request any additional information regarding any product supplied to AIMTRON which may consist of Conflict of Material.

(d) To take appropriate actions up to and including discontinuing purchases from the supplier, if AIMTRON CORPORATION identifies supplier's failure in complying this Policy.

IV. Grievance and Reporting

We encourage our suppliers to report concerns and alleged violations of this Policy on:

AIMTRON CORPORATION
555, S. Vermont Street, Palatine, IL-60067 (USA)
Call: 1-630-372-7500
Visit: www.aimtron.com

Reports can be made anonymously and will fully be kept confidential and allowed by law. We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith.

V. Conclusion

AIMTRON CORPORATION fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a DRC Conflict Free supply chain.

We encourage all our suppliers to likewise support these efforts.

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