



Conflict Minerals Policy Statement

Spellman High Voltage strives to source components and materials from companies that respect human rights, act with integrity and seek to reduce environmental impact. Spellman is committed to complying with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as the applicable requirements of Section 1502 of the Dodd-Frank Act, which aims to prevent the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries ("conflict region").

Suppliers to Spellman are required to commit to being or becoming "conflict-free" (i.e., not sourcing conflict minerals directly and/or sourcing material, where possible, only from conflict-free smelters. Suppliers to Spellman are asked to:

- 1) Provide completed EICC-GeSI declarations stating their commitment to becoming conflict-free.
- 2) Document countries of origin for the tin, tantalum, tungsten, and gold that it purchases.
- 3) Source from third party certified "conflict-free" smelters once lists become available.

For more information on Spellman's conflict minerals program contact:

conflictminerals@spellmanhv.com

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USA

EUROPE

JAPAN

MEXICO

CHINA

