

Conflict Minerals Sourcing Policy

Our commitment to sourcing minerals responsibly

Ellenby Technologies, Inc. is committed to ensure that Conflict Minerals¹ contained in our products are sourced with due respect for human rights, the need to avoid contributing to conflict, and the desire to support development through our supply chain practices.

At the same time, Ellenby does not ban the use of Conflict Minerals that originate in conflict-affected and high-risk areas when they are sourced in accordance with existing international standards. Avoiding the sourcing of all Conflict Minerals from these areas would cause a *de facto* embargo with serious adverse impact on the living conditions of local populations.

We are using the OECD² Due Diligence Guidance as an international framework for meeting the sourcing expectations of our customers, regulators and stakeholders.

We are asking our most significant suppliers containing Conflict Minerals to provide information to identify the smelters/refiners in their supply chains using the RMI Conflict Minerals Reporting Template³. The Reporting Template will protect confidential and business sensitive information through roll-up tools that do not require a list of all suppliers used within a company's supply chain;

We will compare smelters/refiners used by relevant suppliers against an independently-verified list of smelters using responsibly sourced minerals. We will specify to our direct suppliers any smelters we become aware of that have been identified as performing due diligence on their minerals in line with industry or national standards and the OECD Guidance.

Aaron Dobbins
President, Ellenby Technologies, Inc.

¹ Defined by 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4) to be columbite-tantalite, cassiterite, gold, wolframite, or their derivatives; or other mineral or derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

² Organisation for Economic Co-operation and Development, <http://mneguidelines.oecd.org/mining.htm>

³ Conflict Mineral Reporting Template from the Responsible Minerals Initiative
www.responsiblemineralinitiative.org