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SEMPAC Conflict Minerals Policy Statement

SEMPAC is entirely committed to responsible sourcing in compliance with the Requirements of Section 1502 of the Dodd-Frank Wall Street Reform and the Consumer Protection Act, 2010 (the “Dodd-Frank Act” or “the Act”). SEMPAC commits to sourcing components and materials from various companies that share our values around human rights, environmental responsibility, and ethics. We have high expectation for all our suppliers to abide by the policies of our Supplier Code of Conduct, which does not allow human rights abuses or unethical practices. All suppliers we work with are also required to comply with applicable legal standards and requirements.

The U.S. Congress enacted Section 1502 of The Act, based on serious worry that the exploitation of local communities and the trade of conflict minerals by armed groups was in fact helping in financing armed conflict in the Democratic Republic of the Congo and adjoining countries. This contributed closely to the humanitarian crisis in the region. The following minerals are considered conflict minerals: Tin, Tungsten, Tantalum, and Gold.

Although SEMPAC is not subject to the reporting and due diligence requirements of The Act and the rules outlined within, as SEMPAC is not an SEC issuer, SEMPAC does use minerals within the requirements of The Act and agrees in the responsibility of not using such minerals.

SEMPAC supports the goals of ending violence, human rights violations, and environmental devastation in the Covered Countries. Our products have been thoughtfully developed to align with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Due to SEMPAC not sourcing directly from mines or smelters, we request all relevant suppliers to submit conflict minerals data; which includes the following: smelter information, continually engaging with our supply chain in an attempt to ensure conflict minerals data is completely accurate and complete, and using the standardized Conflict Free Reporting Template. We also highly suggest that similar suppliers ensure all smelters in their supply chain engage with the CFSI or other similar bodies.

Based on our efforts, SEMPAC continues to provide effort in ensuring the smelters in its supply chain become CFSI Certified Conflict Free.