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Howman Engineering Conflict Minerals Policy, January 2020

Howman Engineering is aware of concerns that minerals mined in conflict areas in the Democratic Republic of the Congo (DRC) and adjoining countries may be making their way into the electronics industry supply chain and may be fueling human rights violations and environmental degradation.

As a non-SEC registered small business, Howman Engineering is not directly subject to the conflict metals reporting requirements of Section 1502 of the Dodd-Frank Financial Reform Act; however, we are responsibly working with our customers and suppliers to create a system of controls to ensure transparency and traceability for the conflict minerals supply chain. We take careful measures to avoid procuring 3TG metals (Tantalum, Tungsten, Tin and Gold) that are directly or indirectly associated with human rights violations or environmental damage in the DRC and its adjoining countries.

Howman Engineering does not directly source these materials from smelters or mines but uses components containing refined metals in the manufacturing of some of our products. As Howman Engineering does not purchase these metals directly from smelters, we must rely on information provided by our suppliers to determine the source and chain of custody of the metals in our products.

Howman Engineering's reasonable due diligence includes the following:

- We require our suppliers to provide written evidence documenting that raw materials used to produce gold, tin, tantalum and tungsten, used in the materials to manufacture components and products supplied to Howman Engineering, originate from outside the "Conflict Region" or from within the "Conflict Region."**
- We have adopted the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) standards as a reporting tool for due diligence, in conjunction with the EICC Conflict-Free Smelters Program. The EICC's and GeSI's work includes the Conflict Minerals Reporting Template (CMRT).**
- For all off-the-shelf components used in our production process where conflict minerals may be used, we cannot provide accurate information regarding use of conflict materials because we are not the manufacturer of the electronic parts or components.**
- Howman Engineering requests and maintains conflict minerals policies from all original equipment manufacturers and authorized distributors used in our production and services.**

If Howman Engineering becomes aware of a supplier whose supply chain includes metals from a conflict source, Howman Engineering will take the appropriate actions to remedy the situation in a timely manner, including reassessment of supplier relationships. Howman Engineering's supply chain audit is underway, and we expect to have information for our reporting requirements, as well as the requirements of our customers, in support of reporting requirements outlined by the Dodd-Frank regulations.