



Conflict Minerals Policy

At Pacific Aerospace & Electronics (PA&E), we are taking action to help end violence and human rights violations that are being supported by sales of “conflict minerals” from the mines of the Democratic Republic of the Congo (DRC) and adjoining countries. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, state that it is the duty of companies to make aware and act on “conflict minerals” that are being used in production and products manufactured by their suppliers that contain tin, tantalum, tungsten, and gold (3TG). Mandated by the Securities and Exchange Commission (SEC), it is the duty of these companies to promote transparency and support all tiers of suppliers in order to mitigate any monetary contribution to the DRC that they may be obtaining from sales of the conflict minerals. As part of due diligence to our customers, we will take action by creating a policy that addresses conflict minerals.

We use 3TG materials that are critical to the completion of several products that we make, but we only purchase our materials from refiners and not smelters or directly from mines. We will continuously commit to helping our suppliers reduce the chance of potentially purchasing any 3TG material that comes from the DRC. We will, on a yearly basis, ask our suppliers for smelter updates and or additions/changes to their approved smelter list if and when they can provide the information.

In the future, if we become aware of a supplier that is using any of the conflict minerals from the DRC as specified by Dodd-Frank, we will immediately take corrective action to help remedy the situation in order to stop the material from going further into the PA&E supply chain and our customers. We expect our suppliers to also conduct due diligence on their behalf to help reduce the chance of purchasing any materials that come from the DRC mines.

We will keep all pertinent information sent from our suppliers regarding the conflict minerals in order to help our customers stay compliant with the SEC, and for us to support the Dodd-Frank act.

For questions or concerns regarding our policy, please email us at conflictminerals@pacaero.com.