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CONFLICT MINERALS POLICY

The United Nations has found that the trade of certain rare earth minerals is helping to finance the civil conflict in the Democratic Republic of the Congo, characterized by extreme levels of violence. The minerals are commonly referred to as 3TG, (tin, tantalum, tungsten & gold).

In recognition of this issue, in July 2010, the U.S. government enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act was intended to provide a means for starving armed groups in the Congo region of funding used to finance the civil conflict described by the United Nations. In August 2012, as required by Section 1502 of the Dodd-Frank Act, the U.S. Securities and Exchange Commission adopted Rule 13p-1 under the Securities Exchange Act, which requires all public companies to publicly report on an annual basis certain information concerning 3TG contained in products that they manufacture or contract to manufacture to the extent that 3TG is necessary to the functionality or production of the products.

Sealcon fully supports this legislation and is committed to responsible sourcing of 3TG as well as full compliance with the requirements of the Rule. Sealcon does not manufacture and therefore expects all suppliers to assist us in complying with the Rule, by declaring any components, parts and products that contain 3TG and further providing associated country of and other origin information. Suppliers whose stock is not publicly traded still must gather the information as a part of the supply chain that reports to companies that must report to the SEC. Suppliers who supply components, parts or products containing 3TG are expected to source those minerals from ethically and socially responsible sources that do not directly or indirectly contribute to conflict.

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