

Competitive Engineering, Inc



Conflict Mineral Policy Statement 2021

'Conflict Minerals' refers to minerals or other derivatives, specifically, Tin, Tantalum, Tungsten, and Gold, (referred to as "3TG") mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and the adjoining countries where the use of the Conflict Minerals may be directly or indirectly financing human rights violations or benefiting armed groups in those countries. Cobalt was added in December 2018 as the upstream cobalt supply chain is known to potentially involve serious violations of human rights.

In the U.S, the Dodd-Frank Wall Reform and Consumer Protection Act requires all public companies and their suppliers to disclose the chain of custody usage of conflict minerals. COMPETITIVE ENGINEERING (CEI) fully supports this legislation, and its position is to avoid the use of conflict minerals.

COMPETITIVE ENGINEERING does not procure Conflict Minerals directly from mines or smelters; nevertheless, CEI continues to work with our suppliers to ensure no conflict mineral will be used in our products.

CEI has adopted standards in line with the Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC), regarding the process to obtain chain of custody declarations from all CEI sources and managed suppliers ensuring transparency in our supply chain. In addition:

- Promote mineral procurement practices that support peaceful economic and community development in conflict-affected and high-risk areas (CAHRAs).
- Require our supply chain to source 3TG & cobalt from smelters and refiners that are conformant to the Responsible Minerals Assurance Process
- Conduct due diligence to identify and mitigate risks in our supply chain for 3TG & cobalt, following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including all risks identified in Annex II of the OECD guidance, some of which include any forced labor, worst forms of child labor, gross human rights violations, war crimes, direct or indirect support to non-state armed groups and security forces, bribery, and money laundering.