

Newcomb Spring Corporation fully supports the goals and objectives of Section 1502 (“Section 1502”) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), which aims to prevent the use of certain “Conflict Minerals” that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries (as defined in the Act). “Conflict Minerals” include: columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State.

Newcomb Spring is committed to complying with our customers reporting obligations required under Section 1502 of the Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission, including the requirement to conduct inquiries into the source of any Conflict Minerals included in its products. Newcomb Spring also intends to adopt the Electronic Industry Citizenship Coalition Due Diligence reporting process and obtain chain of custody declarations from suppliers to ensure transparency and corporate social responsibility throughout the supply chain.

Newcomb Spring suppliers are required to acknowledge our requirements regarding Conflict Minerals and responsible sourcing. Suppliers are also responsible for passing the same requirements on to their suppliers.

Suppliers will be required to declare that all products supplied either:

1. Do not contain tantalum, tin, tungsten or gold that are necessary to their production or functionality, or,
2. If they do contain these minerals, that they originate from non-conflict areas or from smelters that have been validated by an independent private sector party to be conflict free.

Newcomb Spring reserves the right to request additional documentation from its suppliers regarding the source of any Conflict Minerals included in its products. In addition, suppliers must maintain and provide to Newcomb Spring upon request traceability data for a minimum of five years. Suppliers who do not comply with these requirements shall be reviewed by Newcomb’s supply chain organization for future business.