

Airpot Controlled Document

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| DOC. #: | ADMIN-014 | DOC. NAME: | Conflict Materials Declaration | |
| REV: | 27-May-15 | APPROVED BY: | Tom Lee | SIGNATURE:  |

All information presented is accurate as of the date shown above in the "Rev" block. If the information changes significantly, Airpot must update this document. The scope of this declaration is only for products that Airpot manufactures for sale. When we act as a distributor for other components, the original manufacturer's name and part number are not hidden from our customers, and therefore these products do not fall under the scope of this declaration.

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 directs the SEC to require U.S. public companies to report on the origin of specific metals, specifically tin, tantalum, tungsten, and gold. Airpot Corporation is not a public company and is therefore not subject to the SEC Conflict Minerals disclosure requirement rule. However, because many of our customers must adhere to that rule, they must investigate the source of materials from us and their other suppliers.

Of the relevant materials, Airpot manufactures parts that currently only use tin in the form of wire solder. We use only about 2 lb (1 kg) of solder annually in our products. We buy one specific part number manufactured by Kester, a well known manufacturer of solder products.

Our policy for maintaining the accuracy of this document is:

1. Rely on the supplier's compliance by reviewing their documentation.
2. In the electronic part file for the solder in our MRP system, we have placed a requirement that the compliance of the manufacturer must be reviewed by the Quality Manager at the time when new purchase orders are issued for the material.
3. At that time, the Quality Manager must also investigate whether any new or redesigned component parts use the materials in question. Once the determination has been made, the Manager must take appropriate action to:
 - Obtain documentation from the supplier regarding the Act.
 - Update the disclosure spreadsheet and this document. The current location of the spreadsheet can be found at :
<http://www.conflictreesmelter.org/ConflictMineralsReportingTemplateDashboard.htm>
 - Develop a plan to maintain the accuracy of our disclosure for this new material.
4. Generally discourage the use of the materials above by our product designers. If one is used, they must direct the Quality Manager to take action as shown in part 3 above.

