

Protherm Industries, Inc.
Conflict Free Minerals Policy

Protherm Industries, Inc. will not knowingly procure material supplies and components that contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo (DRC) or an adjoining country.

We urge our suppliers to support this policy in their own procurement guidelines and provide us with accurate country of origin information.

Protherm shall:

- Comply fully with SEC rules.
- Conduct a reasonable country of origin inquiry to document the origins of the Gold, Tantalum, Tungsten and Tin used in our products.
- Establish reasonable objectives and targets with a goal of ascertaining and minimizing Protherm's risk. With a goal of continuous improvement for our Conflict Free Minerals Program, develop a means to measure objectives and targets. Protherm will also review, revise and report these measures, and overall program updates, on an annual basis.
- Empower all employees, suppliers, vendors and contractors to take ownership in complying with the Conflict Free Minerals Policy and to escalate risks in the supply chain to management's attention.
- Effectively communicate to all employees this Conflict Free Minerals Policy and our Conflict Free Minerals Program.