



BTW, Inc.
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BTW Inc. Conflict Minerals Policy

BTW Inc. is a privately owned Contract Manufacturer primarily providing electronic and electro-mechanical assembly services for Original Equipment Manufacturers (OEM's). The assemblies produced by BTW Inc. are manufactured according to the OEM's Intellectual Property (IP) including specifications, bills of material (BOM) and authorized vendor lists (AVL).

The 2010 Dodd Frank Wall Street Reform and Consumer Protection Act rules require "U.S. publicly traded companies" to provide Conflict Minerals* reporting annually. As BTW Inc. is a privately held corporation we are not legally obliged to collect or report this data. In addition, as a Contract Manufacturer, BTW Inc. does not specify the BOM or AVL comprising the OEM's assembly chemistries. It is BTW Inc.'s position that our OEM customers address Conflict Mineral* identification and reporting at the design and AVL selection stage for their benefit with respect to the reporting requirement.

BTW Inc. does perform good corporate citizenship practices and wishes to support our OEM customer's efforts. Currently, BTW Inc. assists with supply chain activities and provides the following statement on all purchase orders to the supply chain of the OEM's AVL:

*"BTW supports Section 1502 of the 2010 Dodd Frank Wall Street Reform and Consumer Protection Act, and the related United States S.E.C. governances that promote transparency and customer awareness regarding the use of *Conflict Minerals.*

*The products that we produce at BTW may contain various components which contain these *Conflict Minerals. These minerals are often necessary for the functionality of our customer's products. BTW does not directly purchase any *Conflict Minerals from any source, and does not knowingly procure any components or materials containing *Conflict Minerals from the **Conflict Region.*

*BTW is committed to working with our customers and our supply chain to increase transparency regarding the origin and traceability of minerals contained in the components that we procure for our customers products. We encourage our suppliers to adopt similar policies and systems with respect to *Conflict Minerals and we will always attempt to ensure that the *Conflict Minerals are being sourced from mines and smelters outside the **Conflict Region or mines and smelters within the **Conflict Region which have been certified by an independent third party as "conflict free".*

**Conflict Minerals: (Tantalum, Tin, Tungsten and Gold)*

***Conflict Region: (Angola, Burundi, Central African Republic, Democratic Republic of the Congo, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia)"*

In addition, if BTW Inc.'s OEM customer desires assistance with identification and reporting activities a Scope of Work (SOW) review and agreement can be established. This SOW may include the roles and responsibilities of both parties, the specific components and materials to be addressed by each party, the extent and time frame in which inquiries and potential results might be deemed satisfactory or closed, the documents and nature of the reporting to be performed and various other activities as applicable. With a complete SOW, an applicable contract including relative compensation for BTW Inc.'s efforts can be established initiating the execution of our mutual efforts.

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