

POLICY ON CONFLICT MINERALS

“Conflict Minerals” refer to minerals or other derivatives mined in the Democratic Republic of Congo (DRC) and adjacent countries where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious humanitarian harm as well as environmental problems.

1st Millennium Electronics condemns these atrocities and supports the implementation of the Dodd Frank law in the United States, which defines conflict minerals as Tin, Tungsten, Tantalum and Gold and any derivatives thereof that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country. We are committed not to purchase raw materials, sub assemblies or supplies which we know to contain conflict minerals.

To promote the advancement of fundamental human rights, 1st Millennium Electronics is committed to ensure that minerals, which support armed groups in the DRC and adjacent areas are not part of its supply chain. We expect our suppliers to undertake reasonable due diligence within their supply chain to ensure that the minerals are not being sourced from mines in conflict areas.

If 1st Millennium Electronics becomes aware of a supplier whose supply chain includes conflict minerals from conflict mines, 1st Millennium Electronics will take the appropriate actions to remedy the situation in a timely manner, including reassessment of the supplier relationships. 1st Millennium Electronics expects our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

STEPHEN READ

Director

For and on behalf of

1ST MILLENNIUM ELECTRONICS LIMITED