

Conflict Mineral Policy Statement

UNICOM Engineering supports and respects the protection of human rights, including the basic human rights of workers throughout our supply chain. We believe in treating all people with respect and dignity and incorporate these principles into our business processes and relationships. UNICOM Engineering encourages our suppliers to adhere to the same high standards.

As part of our global approach to the protection of human rights, we believe in the ethical sourcing of materials used in our products. One area of global concern is the Democratic Republic of the Congo (DRC) and its adjoining countries (together with the DRC, the “Covered Countries”¹). Some of the mining operations in the Covered Countries are controlled by warring militias who use profits from the sale of minerals and materials to finance armed conflict. This ongoing conflict has been linked to human rights violations, labor abuses and environmental degradation.

Four of the materials mined in the Covered Countries have been used in electronics. These materials (tantalum, tin, tungsten and gold) are commonly referred to as 3TG. As a system integrator, UNICOM Engineering does not manufacture, or contract the manufacture of 3TG components.² Nor do we intentionally add 3TG materials to our finished goods.

However as a global citizen, we continue efforts to review purchased products for tantalum, tin, tungsten and gold to ensure the 3TG materials used by our suppliers, if any, are sourced from non-conflict mines. It is the intent of UNICOM Engineering to purchase products or materials that do not contain minerals whose sale financed armed conflict in the DRC and adjoining countries. To this end, UNICOM Engineering is dependent on a complex global value chain with suppliers and other stakeholders to improve and systematically address the process for sourcing minerals that are “conflict-free.”

In support of this policy, UNICOM Engineering will:

- Partner with industry standard COTS (Commodity Off The Shelf) electronic component suppliers that are publicly traded and who publicly disclose support in not using conflict minerals and who have published their own Conflict Mineral Policies.
- Encourage custom component suppliers of UNICOM Engineering to review the UNICOM Engineering Environmental Specification and Electronic Industry Citizen Coalition (EICC)/Global e-Sustainability Initiative (GeSI) Conflict Mineral declaration.
- Advise, when applicable, our suppliers to responsibly source conflict minerals and derivative metals from the Democratic Republic of Congo (DRC) and adjoining countries.
- Influence our suppliers (and their suppliers) to exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten and gold used in components or products supplied to UNICOM Engineering.

Based upon information learned through due diligence efforts, we believe we will make important progress toward ensuring responsible mineral sourcing and improved transparency throughout the supply chain.

¹ Covered Countries include DRC and adjoining countries, previously known as the “DRC Countries” [Securities and Exchange Commission (the “Commission”), Section 1502 (final release)].

² UNICOM Engineering does not meet the definition of reporting issuer. Reporting rule of the Securities Exchange Act of 1934 (“Exchange Act”), Section 13(p)(1)(A) applies to those who directly manufacture or contract the manufacture of components of their products [Sections 13(a) (15 U.S.C. 78m(a)) or 15(d) (15 U.S.C. 78o(d))].