

Policy Statement

The United States Securities and Exchange Commission (SEC) adopted the Conflict Minerals rule pursuant to “Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act”, requiring all publicly traded companies to disclose the use of Conflict Minerals. The term “Conflict Minerals” refers to (known as ‘3TG’ – Tin, Tungsten, Tantalum & Gold) which is necessary to the functionality or production of their products manufactured or contracted to be manufactured. Regardless of where they are sourced, processed, or sold, the intent of the requirements is to end violent conflict by not sourcing the conflict minerals from the Democratic Republic of the Congo (DRC) or the adjoining countries which directly or indirectly finance or benefit armed groups. Cobalt and Conflict Minerals - 3TG and C

In addition to the long-time focus on 3TG, Human Rights Commission have been concerned with cobalt mining in the Democratic Republic of Congo (DRC). Later Cobalt was added on December 21, 2018 as the upstream cobalt supply chain is known to potentially involve serious violations of human rights.

Currently, the areas of consumption and application of Cobalt are mainly battery materials, super heat-resistant alloys for air-craft engine parts and in alloys with corrosion/wear resistant uses, tool steels, hard alloys, magnetic materials. Cobalt in the form of compounds is mainly used as catalysts, desiccants, reagents, pigments, and dyes.

Commitment

The Company intends to comply with the requirements of the SEC’s Cobalt & Conflict Minerals rule and expects our suppliers to do the same. Therefore, we are committed to:

- Not buying products and materials containing Conflict Minerals directly from Conflict Mines
- Asking our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to UPS originate from Conflict Free Sources
- Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals. In addition, we are committed to engaging with our customers regarding their disclosure obligations.

Procurement of Minerals

- The company shall comply with applicable laws regarding procurement of responsible minerals and proceed with due diligence for conflict-affected and high risks mineral, such as Tungsten, Tantalum, Tin, and Gold.
- The company shall verify and inform Talema Group whether the minerals included in the materials or component parts are conflict- affected or high-risk minerals.
- The company shall design and implement a strategy to respond to identified risks.
- The company shall Refrain from sourcing from illegal channels and commit to promoting a responsible supply process.

Procurement of Cobalt

Based on the guidelines of the OECD (The Organization for Economic Co-operation and Development).

- The company shall develop an appropriate management system to conduct due diligence in the supply-chain to determine whether cobalt originates from Conflict-Affected or High-Risk Areas (CAHRA).
- The company shall develop due diligence policies and require tier-one suppliers to
 - adopt corresponding due diligence policies and
 - request the same from their suppliers down to the level of extraction of Cobalt.
- The Company shall identify the risks by mapping the supply-chain and take appropriate steps to mitigate them-Participate in and complete third-party verifications or audits at owned facilities at the request of UPS Group
- The company shall report on the supply chain due diligence.



Responsible Minerals Sourcing Policy

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Corrective Action

- The company shall be involved in supply chain and continue to work with all our suppliers to ensure that we are able to identify the use of Cobalt & Conflict Minerals in our supply chain, and grateful to pass the information to the customers about the Conflict Minerals status of the parts we manufacture and probably involved in someone's due diligence.
- The company shall be updating the UPS Supplier Code of Conduct and our purchasing terms and conditions to reflect this policy.
- The company shall get the declaration from the mill supplier.

Use of Conflict Minerals and Cobalt

To eliminate the impact of our supply chain on conflict minerals, UPS has begun collecting smelter information on Cobalt in addition to Conflict Minerals under Section 1502 of HR 4173. We are actively working with our suppliers to understand or establish their systems for sourcing of raw materials, including any cobalt related minerals which may be used in UPS products.

Declaration

We hereby declare that our products have no substances mentioned in paragraph (e)(4) of Section 1502, Dodd Frank Wall Street Reform Consumer Protection Act (2010) - Conflict Minerals & Cobalt originating in Democratic Republic of Congo (DRC) and its adjoining countries in Africa. No material used in the construction of our products has been manufactured using minerals from Conflict Regions.

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