

Conflict Minerals Policy

Background

In 2012, the Securities and Exchange Commission (SEC) adopted rules implementing the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which require public companies to disclose certain information when a company manufactures or contracts to manufacture products containing Conflict Minerals that are necessary to the functionality or production of those products if the company has reason to believe that the Conflict Minerals may have originated in the Democratic Republic of the Congo (DRC) and the adjoining countries of Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (the Covered Countries). The term "Conflict Minerals" is defined in the conflict minerals rules and refers to tin, tantalum, tungsten and gold.

Policy

Omega Precision is fully committed to the responsible sourcing of Conflict Minerals. Additionally, at Omega Precision we believe we have a social responsibility as a supplier of products containing Conflict Minerals to support the objectives of the Dodd-Frank Act. Omega Precision does not support activities related to Conflict Minerals that may finance or benefit armed groups in the Covered Countries.

Omega Precision is not a publicly traded company and is not directly subject to reporting compliance to the U.S. Securities and Exchange Commission per the Dodd-Frank Act. We are however, prepared to assist our customers in their efforts to comply with the conflict minerals rules adopted by the SEC. Omega Precision supports efforts to eradicate the use of Conflict Minerals including the use of raw material suppliers who ensure the material they are sourcing does not originate from the Covered Countries.

Omega Precision's policy is to source Conflict Minerals from responsible suppliers who exercise due diligence such as:

- Working with smelters who are compliant with the Dodd-Frank Act.
- Re-processing internal conflict minerals-containing by-product (re-cycled material).
- Sourcing conflict minerals from suppliers whose due diligence practices have been validated by an independent third-party audit program.
- Adherence to the frameworks of conflict minerals industry organizations and the Conflict Minerals Reporting Template.