

Date: January 5, 2022

Delphi Engineering Group

Conflict Mineral Policy Statement

As a designer, developer and manufacturer of analog and digital products, Delphi Engineering Group (DEG) is committed to ensuring for compliance with Section 1502 of the Dodd-Frank Wall Street Reform and Customer Protection Act. DEG will apply whatever means is needed to ensure that no components containing conflict minerals (tungsten, tantalum, gold, and tin) originating from the mines in the Democratic Republic of Congo and adjoining countries are knowingly procured or made use of.

While DEG is not able to certify as to the country of origin for minerals contained in items received from its suppliers, it is however committed to working with its supply chain to ensure that all items furnished meet regulatory and customer requirements.

Delphi expects its suppliers to implement the processes necessary to be compliant with section 1502 of the Dodd Frank Act, and that they apply the due diligence necessary for ensuring that product furnished to DEG originate from responsible sources.

Delphi Engineering Group likewise has applied its due diligence in meeting the provisions of Dodd Frank Act, and has implemented the following measures for preventing the receipt of suspect materials:

- 1. All suppliers are asked to complete and return a Conflict Minerals Reporting Template Survey. Where results indicate the distribution of items from suspect origins, the supplier will then be asked to provide measures of containment, followed by permanent preventive measures.
- 2. All DEG issued Purchase Orders (PO's) will contain QA provision clause QCR26, prohibiting distribution of any items containing conflict minerals originating from the Democratic Republic of Congo and adjoining countries.
- 3. Suppliers found violating the requirements of section 1502 of the Dodd Frank-Conflict Minerals Act and those of DEG issued PO's, will be assessed for removal from the DEG Approved Supplier list (ASL).

Should the provisions of the Dodd Frank Act be revised, DEG Management will implement the necessary actions to maintain compliance with said legislation. Further inquires to DEG position on this subject matter should be directed to the undersigned.

Bill McGrath - President

William Scheer - QA Manager