

PROVENTIA Conflict Minerals Policy

Proventia (“the Company”) supports the initiatives to limit the flow of funds to armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries¹ from the production of conflict minerals². Consistent with this, it is the Company’s policy to promote responsible sourcing, by:

- Requiring each supplier of products that reasonably could be expected to contain conflict minerals to represent to the Company whether the products do in fact contain conflict minerals.
- Requiring each supplier of products that contain conflict minerals to provide the Company with reasonable assistance in determining the sources of conflict minerals.
- If a supplier represents to the Company that its products contain conflict minerals, the Company will encourage the vendor to put in place a process³ in order to take actions towards sourcing responsibly. This process would include, but is not limited to:
 - Developing a conflict minerals policy consistent with the Company’s
 - Committing to responsible supply chain initiatives by sourcing from certified smelters when practicable and supporting other industry/in-region initiatives
 - Considering alternative sources if it is determined that the conflict minerals in the supply chain are funding armed groups
 - Providing further evidence, if available, of the supply chain to the mine level if requested by the Company

In the event that a supplier cannot or will not adhere to this policy, it is the Company’s intent to limit purchases from the supplier to the extent practicable or seek alternative suppliers where commercially feasible.

For purposes of this policy, "product" shall mean a product manufactured by the Company or contracted by the Company to be manufactured with the expectation that it will be sold by the Company.

¹ The term “adjoining country” includes Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

² The term “conflict mineral” is defined as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

³ The term “process” refers to a due diligence process in accordance with the OECD Due Diligence Guidance for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas.

December 2015