

XACT WIRE EDM CORPORATION CONFLICT MINERALS POLICY

XACT Wire EDM Corp. is committed to the responsible sourcing of materials. In 2012, the Securities and Exchange Commission (SEC) issued final rules implementing the Conflict Minerals reporting obligations. Known as the “Dodd-Frank” act, the ruling requires that all publicly traded companies must report annually on their usage of specific minerals from the Democratic Republic of Congo (DRC) or adjoining countries.

While XACT Wire EDM itself is not subject to SEC regulations, we do have customers who are. Since we are required to report on conflict minerals to our customers, we require the cooperation of our vendors of conflict minerals (Tantalum, Tin, Tungsten, and Gold), to identify and report on smelters in the supply chain. All vendors that supply XACT Wire EDM with any of the 3TG minerals (Tantalum, Tin, Tungsten, or Gold), are expected to ensure the origin of the minerals are from conflict free smelters.

We realize that our vendors may not be the source of the raw ores used, but may be a few layers removed in the supply chain. We expect that our vendors will, in turn and as necessary, go to their supply chain, and perform the same due diligence by asking their suppliers to report on conflict minerals in their products.

XACT Wire EDM will continuously evaluate our policies to ensure compliance with our customer’s needs and the SEC’s Conflict Minerals ruling, and we will make adjustments when necessary.