



Conflict Minerals Sourcing Policy

Campbell Engineering, Inc. as a socially responsible and ethical company shall follow the regulations of the "Dodd-Frank Act Section 1502".

"Conflict Minerals" originating from the Democratic Republic of the Congo (DRC) are sometimes mined and sold, "under the control of armed militia groups or vigilantes" to "finance conflict characterized by extreme levels of violence". These minerals are found in abundance in these areas and therefore have become the root of financing for the extreme levels of violence by these vigilant groups. These minerals find their way into the global supply chain as they are used in many products around the world.

The four main minerals commonly referred to as the 3TG's are:

1. Tungsten
2. Tantalum
3. Tin
4. Gold

It is in the best interest for all concerned to cut off the supply chain supporting these groups. As a part of Campbell Engineering, Inc. commitment to corporate responsibility and respecting the rights of all humans, both locally and abroad that we adopted this policy and its principles.

"Conflict Minerals", as defined by the Securities and Exchange Commission (SEC) rules, is a broad term which means columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives which are limited to tantalum, tin or tungsten, regardless of whether these minerals finance conflict in the Democratic Republic of the Congo (DRC) or adjoining countries.

In August 2012, the United States Securities and Exchange Commission (SEC) approved the final rule regarding the sourcing of conflict minerals as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. Under this rule, publicly traded companies must report annually to the SEC the presence of "conflict minerals" originating from Central Africa in either the products they manufacture or contract to manufacture, or use in the production process.

In support of this policy, Campbell Engineering, Inc. will:

Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers.

Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the 3TG's in our supply-chain are "conflict-free".

Collaborate with our suppliers, educate those who are unaware and add to our Quality System Supplier questionnaire these questions relating to the manufacture and/or production of "conflict-minerals".

Adopted: May 10, 2019