



## CONFLICT MINERALS POLICY

### BACKGROUND

Section 1502 of the Dodd-Frank Act requires publicly-traded companies subject to SEC regulation to report the presence of certain “conflict materials” in their products that originate from the Democratic Republic of the Congo (DRC) or adjoining countries. The term “conflict minerals” refer to columbite-tantalite, cassiterite, wolframite, and gold, or derivatives which are limited to tantalum, tin, tungsten, and gold (3TGs). This legislation was based on concerns that proceeds from some mining operations in this area have been used to fund violence and terror. TGV supports the humanitarian goals of conflict minerals legislation. However, TGV is not a publicly-traded company, is not subject to SEC regulation, and is therefore not subject to conflict minerals reporting requirements.

### TGV’S COMMITMENT

Even though TGV is not subject to this legislation, many of our customers are. TGV is committed to working with these customers to help them comply with their conflict minerals reporting requirements. We have adopted the Conflict-Free Sourcing Initiative’s (CFSI’s) free Conflict Minerals Reporting Template (CMRT) for conducting surveys among suppliers of materials and components used in the manufacturing of specific products. TGV provides customers with complete CMRT files upon request.

### REQUIREMENTS FOR OUR SUPPLIERS

Our suppliers are expected to provide materials and components that are conflict free, which means either:

1. Any 3TGs necessary to the functionality or production of supplied materials must not directly or indirectly fund armed conflict in the DRC or adjoining countries, or
2. Any 3TGs must be from recycled or scrap sources.

We understand the cost of conflict minerals reporting compliance can be high, especially for small manufacturers like us. However, we expect our suppliers to use due diligence by distributing the CMRT survey upstream to their suppliers until the appropriate smelter/refiner is identified. Once identified, this information must be passed back down through the supply chain to TGV’s direct supplier so they can complete their CMRT and convey it to TGV in electronic format.

Gerard Coron  
General Manager & Managing Director  
01 October 2019

