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Natel Engineering Company, Inc. Conflict Minerals Policy Statement

Natel is committed to operating in a socially responsible way and supports the non usage of conflict minerals mined from the Democratic Republic of Congo (“DRC”) region.

Dodd-Frank Act

The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products. The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future.

Natel’s Commitment to Responsible Sourcing

Natel fully supports the humanitarian goals of the Dodd Frank Act – eliminating illegal mineral trading and the funding of armed conflict while supporting legitimate commercial ventures. Since the supply chain for Conflict Minerals is complex, and consists of many tiers, including mines, traders, exporters, smelters, refiners, alloy producers and component manufacturers, tracing these minerals to their sources is a challenge. We are committed to working with our supply chain to increase transparency regarding the origin and traceability of minerals contained in our products with the goal of ensuring that all products sold by Natel to our customers are “DRC Conflict Free.”

Natel will be carrying out supply chain due diligence consistent with the OECD guidelines. Our efforts to address these issues include notifying our suppliers of our policy on conflict minerals and requiring that they disclose their status with respect to the use of conflict minerals. The aim is to ensure that only “conflict free” materials and components are used in products that we procure.

If we discover the use of these minerals produced in facilities that are considered to be “non-conflict free”, in any material, parts or components we procure, we will take appropriate actions to transition product to be “conflict free”.