

Sonetics Corporation Conflict Free Minerals Policy

Scope

The known sources of material of concern include but may not be limited to tantalum, tungsten, cobalt, tin, and gold and with respect to customers with the need for specific customers having an interest in accurate reporting information per Section 1502 if the US Wall Street Reform and Consumer Protection Act (known as the Dodd-Frank Act).

Policy

Sonetics Corporation understands the Democratic Republic of Congo (DRC) is a country rich in natural resources where mining activities in certain regions/mines within the country which are controlled by non-government military groups have been identified by the EICC as potentially contributing to human rights abuses and environmental damage within the country.

Sonetics does not directly source any raw conflict target minerals for use in our products. Unless Sonetics has a customer that specifically "contracts to manufacture" a product (as termed by Section 1502 of the Dodd-Frank Act), we maintain that affirmed traceability to source is an optional requirement for our company and that a reporting activity to customers or other authority is not legally required as Sonetics is a privately held company, does not report to the SEC and does not normally contract to manufacture product to customer controlled requirements.

However, the Tin based solder in our products that we do specify is controlled by our Bill of material and the manufacturer sources are fully verified in compliance with the EICC conflict free smelters list.

Sonetics sources distributed electronic components which are also deemed outside the supply chain in accordance with Section 1502 of the Frank-Dobb Act which may include unknown content of Tin (and in some cases these materials may contain gold or tantalum and possibly tungsten) through OEM franchised distributors. Although Sonetics cannot fully verify the source of tin, tantalum, tungsten, and gold used in the supply chain, we are committed to purchasing materials we specify from environmentally and socially responsible suppliers in accordance and good standing our company and in compliance with our product Bill of Materials. Our purchase order terms and conditions contain standard contract language which specifies that suppliers source DRC target minerals, only from conflict free sources.

However, if or when Sonetics has specifically chosen to engage in a contract to manufacture agreement to a customer's specification, and the customer is required to report conflict free status per Section 1502 of the Dodd-Frank Act, Sonetics will ensure an accurate information flow and disclosure to our contract to manufacture customers.

Sincerely, Sonetics Corporation January 3, 2013