



Conflict Mineral Policy

HDL Research Lab, Inc. is not a publicly traded company but we are working toward the elimination of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo ("DRC") or adjoining countries from our supply chain. Our ultimate goal is to have a supply chain that consists of material that is DRC Conflict Free.

As part of this policy, HDL will:

1. Exercise due diligence as specified in the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply chains of Minerals from Conflict-Affected and High Risk Areas (2nd Edition) ("OECD Framework") and related 3T and gold supplements.
2. Support industry groups such as the Electronic Industry Citizenship Coalition and collaborations such as Conflict Free Sourcing Initiative that are focusing on industry-wide solutions.
3. Commit to transparency by providing necessary reports and information to customers.

HDL expects its first tier suppliers of 3TG ("In-scope Suppliers") to:

1. Have conflict mineral policies in place to ensure material is sourced from socially responsible suppliers.
2. Exercise due diligence to determine the source of conflict minerals.
3. Not procure material from the DRC or adjoining countries that is not "DRC Conflict Free."
4. Provide the necessary declarations in order to determine if the conflict minerals in the supply chain are DRC Conflict Free.
- 5.

In-scope Suppliers who are not in compliance with these requirements will be reviewed in order for us to determine the extent to which HDL will continue to do business with those Suppliers. HDL will terminate business with any In-scope Supplier if we determine that the Supplier's sourcing of 3TG are directly or indirectly financing armed groups in the DRC or adjoining countries.