

Hical Conflict Minerals Policy

Dodd-Frank Act :

In 2010, Congress enacted the Conflict Minerals provisions of the Dodd-Frank Street Reform and Consumer Protection Act with the goals of eliminating the illegal trade in gold, tin, tantalum and tungsten (Conflict Minerals) and cutting the funding of armed groups in the Democratic Republic of the Congo (DRC) and its neighboring countries (Angola, Burundi, Central African Republic, The Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia) that are engaged in human rights abuses. Section 1502 of the Dodd-Frank Act requires public traded companies to report to the U.S. Securities and Exchange Commission (SEC) and disclose on their website whether any of the Conflict Minerals in the products they manufacture or contract to manufacture originate in the DRC Region and the due diligence conducted to determine if the original sale of the mineral funded armed conflict. The SEC issued implementing regulations and guidance on August 22, 2012.

Hical Commitment to Responsible Sourcing:

For more than 25 years, Hical has built a legacy of operating and sourcing in an ethically and socially responsible manner. Hical continues to be committed to ensuring our fair principles are honored in all of our business decisions.

We are committed to sourcing products from companies that share our values around human rights, ethics, and social and environmental concerns.

Hical 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. Hical purchases materials, components from manufacturers/Distributors and does not directly purchase any Conflict Minerals from any smelters. Since the supply chain for Conflict Minerals is complex, 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 Hical to our customers are “DRC Conflict Free.”

The Declaration given by Hical to its customers is based on the declarations Hical receives from its supply chain.

Hical uses the standard EICC-GeSI (Electronic Industry Citizenship Coalition-Global e-Sustainability initiative) Conflict Mineral Reporting template for the purpose of collecting information's from the supply chain.

Hical requests all its suppliers to comply with this regulation.

Sincerely



Managing Director