

# Environmental and Conflict Minerals Policy

## Hazardous Substance Free (HSF) Policy

Inventus Power™ continuously works with our customers and suppliers to promote a highly environmental and ethically responsible supply chain. Inventus Power™ ensures that all products developed and manufactured by Inventus Power™ complies with RoHS, REACH, and WEEE international regulatory directives, limiting the use of hazardous substances and certifying our materials and sourcing practices are environmentally responsible. As such, all employees of Inventus Power™ are held responsible for maintaining the integrity of these high standards of Inventus Power™ HSF policy for environmental compliance.

## Conflict Minerals Policy

“Conflict Minerals” refers to minerals or other derivatives mined in the Democratic Republic of the Congo (DRC) and/or in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war, resulting in serious social and environmental abuses. In July 2010, the United States passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502(b) of this law requires all US stock listed companies to disclose the usage of Conflict Minerals (Tin, Tantalum, Tungsten, and Gold . . . 3T1G).

Inventus Power™ fully supports this legislation and the Electronic Industry Citizenship Coalition (EICC)/Global e-Sustainability Initiative (GeSI) position to assure that specified minerals are not being sourced from mines in the “Conflict Region”, which are controlled by non-government military groups. Consistent with the ‘OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas’, Inventus Power™ has adopted the EICC Due Diligence reporting process and requires the following declarations from all Inventus Power™ suppliers:

1. Inventus Power™ requires our suppliers to source from socially responsible suppliers. This means sourcing from suppliers who have confirmed non-conflict sources, even if those sources do come from the DRC or adjoining countries.
2. Suppliers are required to have policies and procedures in place to ensure that products and parts supplied to Inventus Power™ are “DRC Conflict-free\*\*”.
3. Suppliers are required to provide all necessary due diligence information, including smelters’ name, to confirm that all 3T1G (Tin, Tantalum, Tungsten, and Gold) supplied to Inventus Power™ is “DRC Conflict-free”.
4. Inventus Power™ requires suppliers to pass this requirement onto their supply chain.
5. Compliance to these requirements will be taken into consideration when selecting and retaining suppliers.

*\*\*“DRC Conflict-free” means that a product does not contain conflict minerals, necessary to the functionality or production of that product, that directly or indirectly finance or benefit armed groups.*

## **EAR Regulations Policy**

Inventus Power™ works with suppliers to ensure Inventus Power's supply chain complies with the rules and regulations of the U.S. Department of Commerce, Export Administration Regulations (EAR), and the Office of Foreign Assets Control (OFAC).

1. EAR stands for the Export Administration Regulations (15 CFR §§730-774) and they are administered by the Bureau of Industry and Security (BIS) under the U.S. Department of Commerce. EAR governs the export of all items in the U.S., especially dual use items as enumerated on the Commerce Control List (CCL).
2. EAR99 is the general "catch-all" classification number assigned to any item that is subject to the EAR but that does not have a specific export control classification number listed in the Commerce Control list. By far, the vast majority of U.S. origin goods are classified as EAR99, and under most circumstances, do not require a license for export.
3. OFAC stands for the Office of Foreign Assets Control (31 CFR §§500-599) and is an office under the U.S. Department of the Treasury. OFAC is responsible for enforcing the foreign policy of the U.S. government, including all trade sanctions, embargoes, and financial interactions with prohibited or blocked individuals or entities.