

UCT, Inc. Conflict Minerals Policy

There has been increased awareness regarding the human rights violations in the mining of certain minerals from an area known as the “Conflict Region”; the Democratic Republic of the Congo (DRC) and surrounding countries. Through the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Act”), publicly traded companies have been chartered to practice reasonable due diligence with their supply chain to determine if certain minerals, including tin, tantalum, tungsten, and gold (3TG), used in their products are being sourced from mines controlled by non-government or unlawful military groups within the Conflict Region (“Conflict Minerals”).

Tracing materials back to their mine of origin is a complex endeavor but an important aspect of responsible sourcing. UCT has followed industry guidelines, such as participating in the Responsible Minerals Initiative jointly founded between the Responsible Business Alliance (formerly the joint Electronic Industry Citizen Coalition) and the Global e-Sustainability Initiative (GeSI), to source conflict-free minerals.

As such, UCT, as good corporate citizens, understands that it is our responsibility to implement strategies that support the objectives of the U.S. regulations on the supply of Conflict Minerals.

Therefore, we are committed to:

- continuous development of strategies and processes aimed at preventing the use of conflict minerals or derivative metals necessary to the functionality or production of our product(s) that finance or benefit armed groups in the Conflict Region to include serious abuses, including torture, forced labor, or child labor, public or private security forces, fraudulent representation of origin, bribery, payments of fees to governments and money laundering.
- not knowingly procure specified minerals that originate from facilities in the Conflict Region that are not certified as conflict free.
- expecting suppliers whose products contain Conflict Minerals to establish policies, due diligence frameworks, and management systems consistent with the Organization for Economic Cooperation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas that are designed to accomplish this goal, and requiring their suppliers to do the same; and
- assisting our customers in their compliance with the Act.
- Our Commitment to the full due diligence of this program

UCT believes in establishing and maintaining long-term relationships with suppliers whenever possible. However, if we determine that any supplier is, or a reasonable risk exists that it may be, violating this policy, then we will require the supplier to commit to devise and undertake suitable corrective action to move to a conflict free source. If suitable action is not taken, we will look to alternative sources for the product. If we determine that any of the components of our products contain minerals from a mine or facility that is non-conflict free, we will work towards transitioning to products that are conflict free.

Relevant Conflict Mineral for UCT Services: Ta (Tantalum)

Our commitment to the full due diligence steps of the OECD Supplement for Tantalum

Last Updated: May 1, 2026

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UCT's Policies