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## Geist Policy on Conflict Minerals

This document details Geist's corporate policy regarding the use of conflict minerals. The policy expressed in this document should be considered to cover the Geist and Geist Europe divisions of PCE Inc.

Section 1502 of the Dodd-Frank Act which was passed by the US Congress in 2010 requires certain companies to annually disclose their use of conflict minerals. Conflict minerals covered under this act include tantalum, tin, tungsten, and gold. Although Geist is not directly subjected to the requirements of the Dodd-Frank Act, Geist recognizes that all companies within the electronics manufacturing industry supply chain are impacted by this legislation. Geist supports the intent of the law, which is the reduction of violence within the Democratic Republic of the Congo and will take several actions to both advance the goals of the Dodd-Frank Act and to provide exceptional support to our customers.

- Geist will work with our direct suppliers to identify purchased components and materials that contain tin, tantalum, tungsten or gold
- Geist will work with our direct suppliers to trace sources of any tin, tantalum, tungsten or gold used in our products back to the smelter
- Geist will document our efforts to trace tin, tantalum, tungsten, and gold minerals back to the smelter and will accurately report the results to our customers
- Geist will continue to monitor industry progress in identifying conflict-free smelters and will adjust corporate policy as the electronics supply chain becomes more fully documented

Geist will not require that our direct suppliers source only conflict-free minerals until an adequate number of smelters has been reliably identified and audited by The Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) to service the electronic industry supply chain. Mandating a conflict-free supply chain before an adequate number of smelters has been identified will prohibit the use of all tin, tantalum, tungsten, and gold originating in the Democratic Republic of the Congo and surrounding countries. This prohibition would cut off the sole income source for many artisanal miners within the region and may result in increased violence within the Democratic Republic of the Congo in direct opposition to the goals of the Dodd-Frank Act. Geist will work continuously with our direct suppliers in order to annually increase the percentage of documented conflict-free minerals that are used in our products until all products can be certified as conflict-free.

