



Conflict Minerals Policy Statement

As a socially responsible company, Rotary Systems has concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights, comply with laws and regulations, and follow a rigorous Code of Conduct.

Rotary Systems supports the efforts of human rights organizations to end violence and atrocities in central Africa, in particular the Democratic Republic of Congo (“DRC”), and nine adjoining countries represented by the Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda, collectively the DRC Region. It has been widely reported that the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum, gold, and the derivatives of cassiterite, columbite-tantalite, and wolframite, now referred to as “Conflict Minerals.” Armed groups fight for control of minds in this region and use forced labor to mine and sell the minerals, which in turn funds ongoing violence.

In August 2012, the United States Securities and Exchange Commission approved the final rule regarding the sourcing of conflict minerals as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. Under this rule, publicly traded companies must report annually to the SEC the presence of conflict minerals originating from the DRC Region in either the products they manufacture or contract to manufacture, or using the production process.

Rotary Systems will work to comply with our customers’ requests with respect to the Rotary Systems supply chain and we encourage our suppliers to do the same. The process of tracing conflict minerals through a global supply chain is complicated and time-consuming, and many component suppliers or sub-suppliers may lack the resources to trace minerals all the way back to their source. Rotary Systems will endeavor in good faith to have its suppliers exercise reasonable due diligence to evaluate their respective supply chains for the information called for by the Conflict Minerals rule. Additionally, Rotary Systems does not directly purchase raw metal ores that may be used in the manufacture of our products from smelters or mines. Rather, we are several supply-chain layers removed from the mining and processing of these metals, and as a result do not have firsthand knowledge of their direct source. Rotary Systems reserves the right to take appropriate actions up to and including discontinuing business with a supplier should Rotary Systems determine the supplier to be deficient in complying with the Conflict Minerals rule.

A handwritten signature in black ink that reads "Chad A. Ruwe".

Chad A. Ruwe
President

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