

Conflict Minerals Policy

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules to implement annual reporting and disclosure requirements related to "Conflict Minerals," as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

Specifically, Section 1502 imposes Securities and Exchange Commission (SEC) reporting requirements upon manufacturers if their products contain metals derived from minerals defined as to "Conflict Minerals" which currently include cassiterite (tin), columbite-tantalite (coltan, niobium, tantalum), wolframite (tungsten) and gold, their derivatives, or other minerals designated by the Secretary of State.

These Conflict Minerals are of concern because mines in the Democratic Republic of the Congo (DRC) and surrounding countries are important sources of these minerals. Some of these mines are controlled by armed groups that finance their conflicts through mining activities.

The Conflict Minerals reporting, and disclosure requirements, were enacted to further the humanitarian goal of ending violent conflict and human rights abuses in the DRC and surrounding countries, which have been partially financed by the exploitation and trade of Conflict Minerals

Pincasa does not purchase directly from smelters. Therefore, must rely upon our suppliers to identify the sources of Conflict Minerals and to declare the conflict Mineral status of their products.

Pincasa is committed to ethical business conduct and responsible sourcing, and because of that, Pincasa is committed to sourcing components and materials from companies that share our values and commitment to human rights, ethics and environmental responsibility. Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. Pincasa expects suppliers to establish their own due diligences to ensure conflict-free supply chains.