**SunnyCor, Inc. Policy Regarding Conflict Minerals**

Armed groups operating in the eastern Democratic Republic of the Congo (DRC) have controlled many of the region’s mines or transit routes and have engaged in armed conflict characterized by extreme levels of violence and human rights violations. In response to concern that the exploitation and trade of “conflict minerals” originating in the DRC is helping to finance the conflict, the U.S. Congress enacted a measure, in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Act), that requires U.S. publicly-traded companies to disclose any "conflict minerals" necessary to the functionality or production of products they manufacture or contract to manufacture. “Conflict minerals” are defined in the Act and Conflict Minerals Rules adopted by the U.S. Securities and Exchange Commission (SEC). “Conflict minerals” include **gold**, as well as **tin**, **tantalum**, and **tungsten**, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future. Companies using conflict minerals must also disclose their supply chain inquiries to verify whether these minerals originated in the DRC or adjoining countries, and whether these minerals directly or indirectly financed or benefited armed groups in the DRC or an adjoining country. The Act is intended to provide corporate accountability and public transparency to the sourcing of conflict minerals. Section 1502’s disclosure and reporting provisions are designed to discourage companies from sourcing conflict minerals from mines controlled by armed factions located in the DRC or adjoining countries, thereby cutting off the revenue to the armed groups that are linked to human rights abuses.

While the burden of compliance is on the public companies who manufacture products containing conflict minerals, members of their supply chains for those products are also impacted by the reporting requirements. Conflict mineral sourcing information must be gathered by the public companies’ suppliers and successively upstream until the smelter/refiner is identified and that information must be passed back down through the levels of the supply chain to the public company.

Recognizing that certain of the products that we supply to our customers may be produced with conflict minerals and recognizing that certain of our customers are required to make disclosures or certifications to their customers regarding the source of these conflict minerals, SunnyCor Incorporated hereby adopts a CONFLICT MINERALS POLICY STATEMENT as follows:

**SunnyCor Incorporated’s Conflict Minerals Policy Statement**

SunnyCor supports the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and surrounding countries. We are committed to the responsible sourcing of conflict minerals throughout our supply chain. Accordingly, our suppliers are expected to supply materials to SunnyCor that are DRC conflict-free (do not contain metal derived from “conflict minerals’; **gold**, columbite-tantalite (**tantalum**), cassiterite (**tin**), wolframite (**tungsten**), or their derivatives such that they directly or indirectly finance or benefit armed groups through mining or mineral trading in the Democratic Republic of the Congo or an adjoining country). Our 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.

SunnyCor hereby adopts the following CONTRACT CLAUSE to be added as a Supplemental Quality Assurance Requirement in supplier purchase orders for raw material or plating services:

**Products must be “DRC conflict free”**

Products containing “conflict minerals” necessary to the functionality or production of the product must not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or an adjoining country. “Conflict minerals” are defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Act) and Conflict Minerals Rules adopted by the U.S. Securities and Exchange Commission (SEC) and include **tantalum**, **tin**, **tungsten** and **gold**. Supplier must have a conflict mineral policy and due diligence measures in place that will enable SunnyCor to reasonably assure that products and components supplied to us containing conflict minerals are “DRC conflict free” as defined by the Act and SEC rules. Supplier shall provide data on their conflict mineral supply chains to SunnyCor upon request.

Signed and dated this 30th day of March, 2015

John W Cole

President, SunnyCor Incorporated