



December 12, 2018

ACDi Conflict Minerals Policy Statement

U.S. Securities and Exchange Commission rules require certain companies to disclose the extent to which the products they manufacture or contract to manufacture contain designated conflict minerals sourced from mines in the Democratic Republic of the Congo (DRC) or adjoining countries. Conflict minerals include tantalum, tin, tungsten and gold, which are used in many electronic components and computer products. ACDi, as a privately held firm, is not subject to SEC reporting requirements regarding conflict minerals.

As a contract electronics manufacturer that uses electronic components, ACDi promotes the traceability of these minerals and the transparency of the supply chain. ACDi firmly believes that its customers should be fully informed about the products they purchase. While ACDi, as an assembler, is not able to certify as to the country of origin of the minerals contained in the products manufactured by ACDi's suppliers, ACDi is committed to working with its customers to supply products that meet the customer's specifications.

With respect to those limited aspects of ACDi's business that manufacture or contract to manufacture products that contain conflict minerals that are necessary to the functionality or production of the product, ACDi does not directly purchase any conflict minerals from any source. Any materials that ACDi does procure that may contain conflict minerals are generally specified by our customer on their approved supplier list, over which ACDi has limited control.