

PowerDrive LLC

MECHANICAL P.T. COMPONENTS

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PowerDrive LLC Statement on Conflict Minerals

PowerDrive LLC is committed to supporting responsible sourcing of its materials from suppliers that share our values around human rights and environmental responsibility. To further this objective, we are committed to complying with the requirements set forth in the final rule regarding the use of “Conflict Minerals” under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the related rules and regulations issued by the U.S. Securities and Exchange Commission (“SEC”).

The rules and regulations require certain public companies to perform supply chain due diligence to identify the extent to which their products contain Conflict Minerals originating from the Democratic Republic of Congo and certain adjoining countries (“Covered Countries”). “Conflict Minerals” is currently defined as tin (cassiterite), tungsten (wolframite), tantalum (columbite-tantalite or coltan), and gold.

In order to support a conflict-free supply chain and comply with the applicable rules and regulations, PowerDrive commits to:

- Support the objectives of the legislation on Conflict Minerals.
- Perform supply chain due diligence in accordance with the Organization for Economic Cooperation and Development’s internationally recognized and established due diligence framework.
- Identify the presence of Conflict Minerals in our supply chain that are or may be necessary to the functionality of our products.
- Develop repeatable processes to determine whether Conflict Minerals in our supply chain, if any, originate from Covered Countries or are derived from recycled or scrap sources.
- Perform a series of supplier inquiries to ensure the responsible sourcing of minerals within our supply chain.
- Educate our suppliers with respect to the SEC reporting requirements related to Conflict Minerals.
- Require all of our suppliers to adhere to the PowerDrive LLC Supplier Code of Conduct, which includes the responsible sourcing of materials.

In addition to the foregoing commitments, we expect our suppliers to perform similar due diligence on the sources of Conflict Minerals in their respective supply chains and make their findings available to PowerDrive LLC.