



Conflict-Free Mineral Policy

This Policy is intended to assist our customers in complying with Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”), which was adopted by the Securities and Exchange Commission (“SEC”) to implement reporting and disclosure requirements related to certain minerals. The Rule imposes reporting obligations on SEC registrants (a “Covered Company” or “Covered Companies”) who manufacture products containing certain minerals, including tin, tantalum, tungsten, and gold (“3TG” or “conflict minerals”). These reporting requirements apply to Covered Companies regardless of the geographic origin of the 3TG and regardless of whether or not sales of 3TG fund armed groups in the Democratic Republic of the Congo or an adjoining country (the “DRC” or “Covered Countries”).

This Rule requires a Covered Company to conduct a “Reasonable Country of Origin Inquiry” that is designed to determine whether any of the 3TG in its products either originated in Covered Countries, or were from recycled or scrap sources and, under certain circumstances, whether due diligence is required on the source and chain of custody of the 3TG.

TPW has conducted Reasonable Country of Origin Inquiries that entailed surveying our primary suppliers of specific Tungsten components and Tungsten Powder that we procure. None of our direct suppliers reported that their products contain 3TG originating from a smelter that supports armed groups in the Covered Countries.

After completing a Reasonable Country of Origin Inquiry and exercising due diligence, we have determined in good faith that our products are DRC conflict-free.