

CONFLICT MINERALS POLICY

Adopted June 1, 2018

A commitment value of Integrity is fundamental to the philosophy of Wermundsen Corporation including its subsidiaries Gistele Oy, Solotop Oy, Wermundsen Oü, Wexon Oy and OOO "Wexon" ("Wermundsen"). Because of this commitment, it is Wermundsen's policy to responsibly source minerals and to work with its supply chain partners to ensure compliance with appropriate diligence and disclosure requirements relating to Conflict Minerals (defined below). If our products contain Conflict Minerals that are necessary to the functionality of such products, then our policy is to conduct a reasonable country of origin inquiry to determine whether such Conflict Minerals come from the Democratic Republic of the Congo, or one of the surrounding countries, or from recycled or scrap sources.

DEFINITION OF CONFLICT MINERALS

Conflict Minerals include gold, cassiterite, columbite/tantalite and wolframite and their derivatives, which are limited to tin, tungsten and tantalum.

EXPECTATIONS OF SUPPLIERS

Wermundsen does not purchase directly from smelters or mines and is in most cases many levels removed from these market participants. The international supply chain for these minerals is complex and the tracing of their origin can be challenging. Consequently, Wermundsen relies on its suppliers to identify the sources of Conflict Minerals and to declare whether the products they sell to Wermundsen contain Conflict Minerals. Wermundsen expects each of its suppliers to:

- Identify any Conflict Minerals supplied to Wermundsen or contained in products supplied Wermundsen;
- Conduct a reasonable inquiry into the country of origin of Conflict Minerals incorporated into products it provides Wermundsen, if any;
- Conduct appropriate due diligence on their supply chains in accordance with industry standards;
- Institute risk assessment and mitigation actions necessary to implement such country of origin inquiry and due diligence procedures; and
- Provide additional information reasonably requested by Wermundsen that is necessary for Wermundsen to fulfill its own due diligence and disclosure obligations.

Wermundsen undertakes to regularly perform due diligence and to survey its suppliers to verify compliance with this Policy. Wermundsen may reconsider its willingness to partner with suppliers that fail to comply with this Policy.

A copy of this Policy may be obtained on Wermundsen's website at www.wermundsen.com. This information is being provided as of the date set forth above.