



MEEHAN ELECTRONICS CORPORATION ✦ CORD MASTER ENGINEERING

MEC-CME Conflict Minerals Policy Statement

Meehan Electronics Corporation (MEC) and Cord Master Engineering (CME) are committed to preventing the use in our products and services of the specified conflict minerals (i.e. gold (AU), tantalum (TA), tungsten (W) and tin (Sn)) sourced from ores mined in the conflict areas of the Democratic Republic of Congo (DRC) and its nine adjoining countries.

As non-SEC registered small businesses, MEC and CME are not directly subject to the conflict metals reporting requirements of Section 1502 of the Dodd-Frank Financial Reform Act; however, we are responsibly working with our customers, suppliers and industry organizations to create a system of controls to insure transparency and traceability for the conflict minerals supply chain. More specifically, we have taken the following initiatives:

1. We have identified where the conflict minerals are necessary to the functionality of our manufactured products and to our services.
2. We have adopted the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) standards as a reporting tool for due diligence, in conjunction with the EICC Conflict-Free Smelters Program.
3. For all conflict minerals *raw materials* MEC-CME purchases directly we have:
 - a. received our suppliers' conflict minerals policy,
 - b. along with letters of notification of the countries of origin where the ores were mined,
 - c. as well as disclosure of the specific smelters that were used to refine the ores.
 - d. All smelters were verified as approved by the EICC Conflict-Free Smelters Program list.
4. For all *COTS components* we use in our production process where conflict minerals may be used, we are not in a position to provide accurate information relating to the use of conflict minerals because we are not the manufacturer of the electronic parts or components in the standard parts we purchase. Therefore, we have initiated the following due diligence actions with our suppliers:
 - a. We've requested the conflict minerals policy from all OEMs and authorized distributors on our Approved Suppliers List – including, where applicable, their upstream due diligence processes for risk mitigation using the EICC/GeSI Due Diligence Tool and Conflict-Free Smelter Program reporting template.
 - b. We are documenting their response on our Approved Supplier List and making a reasonable assessment of their compliance.
 - c. As the conflict minerals supply chain requirements become standardized and fully enforced by the May 31, 2014 reporting deadline, we will qualify existing suppliers and remove non-compliant suppliers from our ASL to ensure transparency and traceability of conflict-free minerals in all of our products and services.
 - d. We will continue to request and monitor the required documentation of conflict-free compliance from our suppliers as part of our ongoing AS9100-C quality system.
5. We have posted our own conflict minerals policy on our company website at: www.mec-cme.com

For more information on MEC-CME's conflict minerals program contact us at info@mec-cme.com

