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BETE Conflict Free Materials Due Diligence Policy

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 directed the U.S. Securities and Exchange Commission (SEC) to adopt a rule requiring public companies with conflict minerals (tin, tantalum, tungsten and gold) that are necessary to the functionality or production of products manufactured or contracted to be manufactured by such companies to disclose annually whether any of those conflict minerals originated in the Democratic Republic of Congo (DRC) or an adjoining country. The rule is intended to further the humanitarian goal of ending the extremely violent conflict in the DRC which has been financed in part by the exploitation and trade of conflict minerals originating in the DRC.

BETE is committed to conducting business fairly and ethically, with respect for human rights and in compliance with all applicable laws and regulations. We are committed to complying with the SEC's rule on conflict minerals and the responsible sourcing of minerals through our global supply chain. We are actively and diligently working with our global supply chain partners to determine the origin of any conflict minerals they may supply to us, and will continue to work with them towards the goal of providing greater supply chain transparency and responsible sourcing.

BETE Expectations for Suppliers.

- Supply "DRC Conflict Free" materials. BETE suppliers are expected to supply materials to BETE that are "DRC conflict free," which means either: 1) any tin, tantalum, tungsten and gold (3TG's) necessary to the functionality or production of supplied materials must not directly or indirectly fund armed conflict in the DRC or adjoining countries, or 2) any 3TGs must be from recycled or scrap sources.
- Adopt conflict minerals policies. Suppliers to BETE must adopt a policy regarding conflict minerals consistent with BETE's policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps.
- Send surveys to their suppliers, and complete BETE's survey. BETE suppliers are expected to pass the CFSI public Conflict Minerals Reporting Template (www.conflictreesourcing.org/conflict-minerals-reporting-template) to their suppliers and successively upstream until the smelter is identified. The survey information must then be passed back down through the levels of the supply chain to BETE's direct supplier, who then can provide their Conflict Minerals Reporting Template to BETE.