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Perma Pure LLC Conflict Minerals Policy

The United States Securities and Exchange Commission (“SEC”) has adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products. The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future.

Perma Pure LLC supports ending the violence and human rights violations in the mining of these minerals from the defined “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. We are showing our commitment to supporting the SEC requirements by implementing the following actions at a minimum:

- Supporting the aims and objectives of the U.S. legislation on the supply of “conflict minerals”.
- We will not knowingly procure specified metals that originate from facilities in the “Conflict Region” that are not certified as “conflict free”.

In an effort to ensure compliance we will integrate into our procurement activities a requirement for our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from:

- Mines and smelters outside the “Conflict Region”, or
- Mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”.

This due diligence includes having our suppliers provide documentation as evidence to support their declarations.

Our ultimate goal is to manufacture products that have been produced solely with “conflict free” minerals. As we gather information or at any time during the manufacturing phase we discover the use of procured minerals produced in facilities that do not meet the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, we will take appropriate actions to transition to product that is “conflict free”.

Richard Curran
President

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