

# Owl Cyber Defense Solutions Policy on Conflict Minerals

**Owl Cyber Defense Solutions, LLC (“OWL”)** is committed to be a good corporate citizen and to ensure the health, safety and protection of people who come into contact with our products and business. OWL also requires a high social, environmental and human rights standard for our suppliers. OWL views its obligations in relation to Conflict Minerals as part of this corporate responsibility.

In August 2012, the United States Securities and Exchange Commission (SEC) issued its final rules regarding Conflict Minerals (known as ‘3TG’ – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Act). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the Act. Although OWL is not subject to the rules of the Act, many of OWL’s customers are subject to those rules and OWL has implemented this Policy in an effort to assist its customers with their reporting requirements.

As a manufacturer of electronics products, OWL does not purchase any raw materials of any sort and thus does not ever buy materials containing Conflict Minerals directly from Conflict Mines.

OWL assembles its electronics products from components sourced from third-party suppliers. Pursuant to this Policy, OWL monitors the Conflict Mineral Disclosure from each of its third-party suppliers to ensure that any Conflict Minerals contained in the components supplied to OWL originate from Conflict Free sources. OWL’s suppliers must either affirm that there are no Conflict Materials in their components or that they do not knowingly use any Conflict Materials in their components.

In addition, OWL is fully committed to engage with its customers regarding their disclosure obligations.



Owl Cyber Defense Solutions, LLC leads the world in data diode and cross domain network cybersecurity. With a constant focus on customers in the military, government, critical infrastructure, and commercial communities, Owl develops market-first, one-way data transfer products to meet a variety of operational needs, from entry level to enterprise.