



CONFLICT MINERALS POLICY

Paradigm Precision is the trade name for the following companies: Turbocombustor Technology, Inc.; Paradigm Precision Holdings, LLC; Smith West, LLC; Palmer Manufacturing Co., LLC; TM Industries, LLC; Turbocombustor Technology, Kft. (Hungary); and Eurocast SA (Tunisia).

Conflict Minerals are the subject of a federal legal requirement that affects the entire supply chain, all the way up to the ultimate end users of our products. “Conflict Minerals” refers to tin, tantalum, tungsten and gold. Some of these minerals originate from the Democratic Republic of the Congo or certain adjoining countries (the “DRG Region”). Armed groups control some mining operations in the DRC Region and use proceeds from the sale of Conflict Minerals to finance ongoing violence and human rights abuses. Under the Dodd-Frank Act, the U.S. Securities and Exchange Commission (the “SEC”) has adopted rules that require public companies to provide certain disclosures if any products they manufacture or contract to manufacture contain Conflict Minerals that are necessary to the functionality or production of those products. Companies subject to the SEC requirements need to collect information about Conflict Minerals from their suppliers.

Paradigm Precision supports the objectives of the SEC’s rules and will undertake steps to help avoid use of Conflict Minerals that have funded armed groups in the DRC Region. We expect our suppliers to support these efforts, also taking steps to help ensure that Conflict Minerals that funded such armed groups are not used in materials supplied to Paradigm Precision. In this regard, Paradigm Precision is engaging with our suppliers that provide materials or products that may contain Conflict Minerals, requiring their cooperation to see that necessary diligence regarding the sources of Conflict Minerals in the items supplied to Paradigm Precision is conducted.

Paradigm Precision’s Commitment:

Fully support the objectives of the U.S. legislation and SEC rules on the supply of “Conflict Minerals.”

Not knowingly procure or supply products or materials that contain Conflict Minerals that fund conflict in the DRC Region.

Require our supply base to perform due diligence to see that they are using only those sources of Conflict Minerals that are certified as “Conflict Free,” and to provide documentation thereof.

Paradigm Precision’s Expectations of Our Suppliers:

Supply “Conflict Free” material, which means either: 1) any Conflict Minerals necessary to the functionality or production of supplied materials must not directly or indirectly fund armed groups in the DRC or adjoining countries, or 2) any Conflict Minerals in supplied materials must be from recycled or scrap sources.

Adopt conflict minerals policies. Suppliers must adopt a policy regarding conflict minerals that facilitates compliance with Paradigm Precision’s policies, implement management systems to support compliance with these policies and **require** their suppliers to take the same steps.

Collect information from their suppliers regarding the source and chain of custody of any Conflict Minerals in supplied materials, and cooperate inquiries from Paradigm Precision or our customers regarding Conflict Minerals in supplied materials. Suppliers must pass down conflict minerals inquiries through the levels of the supply chain to the smelter level.

If it is determined that any of our suppliers are providing non-Conflict Free material or products, Paradigm Precision will take appropriate action to transition the affected items to be Conflict Free.