



January 19, 2022

From: Paradigm Precision Supply Chain Management

To: Our Suppliers

Subject: Conflict Minerals Reporting under the Dodd-Frank Act – **Report Required**

Dear Supplier:

You are receiving this notice because you are a supplier to one or more Paradigm Precision companies. These companies include Turbocombustor Technology, Inc.; Paradigm Precision Holdings, LLC; Palmer Manufacturing Co., LLC; TM Industries, LLC; Paradigm Manchester Inc.; Paradigm Orillia Technology Inc. (Canada); Paradigm Precision Burnley, Ltd. (UK); and Eurocast SA (Tunisia).

The Dodd-Frank Act imposes certain requirements relating to “Conflict Minerals.” Specifically, publicly-traded companies whose products contain metals derived from certain minerals, defined as “Conflict Minerals,” which includes tantalum, tin, tungsten, and gold, are required to include certain information in reports under SEC requirements. The reporting requirements reflect congressional concern that revenues obtained from mining and transport of “Conflict Minerals” finance the ongoing conflict in the Democratic Republic of Congo (DRC) and surrounding countries and the resulting humanitarian crisis.

The rule requires companies to conduct a “reasonable country of origin” inquiry to determine whether Conflict Minerals used in products they manufacture or contract to manufacture originated in the DRC or an adjoining country or came from scrap or recycled sources. If any Conflict Minerals (1) originated or may have originated in the DRC or an adjoining country and (2) did not come, or may not have come, from scrap or recycled sources, companies will have to conduct additional supply chain due diligence and determine whether those Conflict Minerals are “DRC conflict free” (that is, they did not directly or indirectly finance or benefit armed groups in those countries). More information about this rule can be found at <http://www.sec.gov/news/press/2012/2012-163.htm>.

Paradigm Precision is committed to sourcing responsibly and considers mining activities that fuel conflict as unacceptable. Paradigm Precision’s efforts related to conflict minerals are aligned to the work of the Electronic Industry Citizenship Coalition® (EICC®) and Global e-Sustainability Initiative (GeSI). The EICC’s and GeSI’s work includes the Conflict-Free Smelter Program and the Conflict Minerals Reporting Template (the “Template”).

We are collecting information on Conflict Minerals to comply with the provisions of the Dodd-Frank Act. This is being done through the use of a reporting template endorsed by the EICC, which we have made available through our website or by email to our direct suppliers. The Template provides a common industry approach for the collection of sourcing information related to conflict minerals. As a supplier, you may have previously provided similar reports to other customers of your company.

200 Adams Street, Manchester, CT 06042



Please be sure to review the information with respect to parts or materials actually supplied to Paradigm Precision in completing the Template. Instructions for completing the Template are provided below.

INSTRUCTIONS:

- In the email you received transmitting this letter, open the attachment entitled “2021 RMI Conflict Minerals Reporting Template”
- Complete the form (in Excel format for your convenience)
- Email completed form to conflict_materials@paradigmprecision.com by no later than February 28, 2022.

NOTE: If you are unable to open, or need another copy of, the Reporting Template, contact Victoria Premo at the number or email address below.

The information contained in the Template constitutes a critical part of Paradigm Precision's due diligence program. Training materials, including a video and links to other support, are available at www.conflictreesmelter.org. Should you have questions regarding the timely completion of this form, please contact Victoria Premo at (772) 403-6451 or victoria.premo@paradigmprecision.com.

Thank you for your cooperation and continued support.

Sincerely,

Paradigm Precision