

Conflict Minerals Policy Statement

October 28, 2015

“Conflict Minerals” refers to tin, tantalum, tungsten and gold; the derivatives of cassiterite, columbite-tantalite, and wolframite; regardless of where they are sourced, processed or sold. In July 2010, the United States passed HR4173, the Dodd-Frank Financial Reform Bill (section 1502 [b]) requiring all US stock listed companies and their suppliers to disclose the chain of custody usage of Conflict Minerals.

Logic PD, Inc. (“Logic PD” or the “Company”) is committed to ethical practices and compliance with all applicable laws and regulations. Logic PD fully supports the Electronic Industry Citizenship Coalition (EICC)/Global e-Sustainability Initiative (GeSI) position to assure that specified minerals are not being sourced from mines in the conflict region. While the Company does not source these metals directly, Conflict Minerals may exist in the materials and components we source. Logic PD is committed to working with customers and suppliers to responsibly source the materials and components used in manufacturing both the Company’s and customers’ products, which may contain these minerals. In an effort to meet customers’ need to comply with SEC reporting regulations, Logic PD is using the EICC Due Diligence reporting process to obtain chain of custody declarations from all Logic PD-sourced and managed suppliers. Logic PD requires chain of custody declarations from suppliers to verify the origin of the conflict minerals contained in their products and the products they supply.

Logic PD expects its suppliers:

- to source materials from socially responsible sub-tier suppliers and manufacturers. This means that they will source with suppliers who have confirmed non-conflict sources.
- to assist the Company’s efforts to comply with the Dodd-Frank regulation and provide all necessary declarations.
- to undertake reasonable due diligence with their supply chain to determine the origin of Conflict Minerals, including development of policies and procedure that flow this requirement down through their supply chain if they do not source directly from smelters and determine the source of specified minerals.

Logic PD expects the following from the affected customers within the Company’s contract manufacturing operations:

- to design in components that can be sourced from socially responsible suppliers.
- to adequately specify manufacturers on the Bill Of Material to ensure compliance with their needs.
- to be responsible for gathering declarations where the supply chain has been established by our customer.

Logic PD expects customers who require only design services to provide their needs and expectations of Conflict Minerals during project definition stages.

Logic PD will work with its suppliers and customers, where the supply chain has been established by the customer, to seek remedies for non-compliance with this policy. The process of tracing the conflict minerals through the supply chain is complicated and time-consuming. Therefore, the Company will rely on industry initiatives, such as the Conflict Free Smelter Program, for assistance in complying with the requirements on conflict minerals.

For questions and comments regarding this policy contact: contracts@logicpd.com



6201 Bury Drive Eden Prairie, MN 55346

T : 952.941.8071 F : 952.941.8065 I : www.logicpd.com