

SigmaTron International, Inc. Conflict Minerals Policy

"Conflict Minerals" refers to minerals or other derivatives (including gold, wolframite, cassiterite, columbite-tantalite and their derivative metals, which include tin, tantalum and tungsten) mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries¹ where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. 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. More specifically, the requirements of Section 1502(b) obligate SigmaTron International, Inc. (SII) to:

- disclose annually on its website whether any of the specified minerals used in SII's products originated from the DRC or an adjoining country;
- if the specified minerals did originate in the DRC or adjoining countries, file reports with the SEC describing due diligence measures taken to identify the source of the Conflict Minerals; and
- have such reports audited and certified by an independent third party, and include within such reports:
 - a description of the products;
 - the identity of the auditor of the report;
 - the facility(/ies) (such as refineries and smelters) used to process the Conflict Minerals;
 - the country of origin of the Conflict Minerals;
 - the efforts to determine the mine or location of origin; and
 - a certification statement of SII.

SII is working to comply with this legislation and to assure that specified minerals which it uses in its products are conflict free. Further, SII is adopting reporting processes and obtaining chain of custody declarations from all SII sourced and managed suppliers to ensure transparency in its supply chain.

- SII expects its suppliers to source materials from socially responsible suppliers. This means that SII will not only source from regular suppliers using sources from regions other than the DRC and its adjoining countries, but also source with suppliers who have confirmed conflict free sources even if those sources do come from the DRC and its adjoining

¹ The countries adjoining the DRC are those that share an internationally-recognized border with the DRC. These are presently Angola, Burundi, Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

countries.

- SII expects all its suppliers to familiarize themselves and comply with the Dodd-Frank regulations, to implement Conflict Mineral policies that are consistent with this policy, and provide all necessary declarations.
- Suppliers must pass all of these requirements on to their supply chain if they don't source directly from smelters and determine the source of specified minerals.
- Suppliers must maintain reviewable business records for a period of not less than seven (7) years supporting the source of specified minerals.
- From time to time, at SII's request, suppliers must provide to SII written certifications and other information concerning the source of specified minerals included in products and components supplied to SII and the supplier's compliance with this policy generally.
- Suppliers who are non-compliant to these requirements shall be reviewed by SII for future business.

SII's shares concerns about the use of resources to fund armed conflict in the DRC, and is intent on making sure its activities are not contributing to the issue. If there are any questions regarding Conflict Minerals, product compliance, or corporate social responsibility issues, please contact us at conflictminerals@sigmatronintl.com.