

Matrix Policy on Conflict Minerals

Version 1.1

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Background

In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”) requiring the Securities and Exchange Commission (“SEC”) to issue rules specifically relating to the use of “Conflict Minerals” within manufactured products. Conflict Minerals are currently defined by US Law as tin, tantalum, tungsten and gold (also known as “3TG”) and related derivatives. The SEC rules require any SEC registrant whose commercial products contain any 3TG (“3TG Product”) to determine whether the 3TG in the 3TG Product originated from the Democratic Republic of the Congo (“DRC”) or adjoining countries (collectively, the “DRC Region”) and, if so, whether the 3TG is “conflict free”. “3TG Conflict Free” means that the supply chain is transparent and the 3TG in 3TG Products does not directly or indirectly benefit armed groups responsible for serious human rights abuses in the DRC Region. By enacting this provision, Congress intends to further the humanitarian goal of ending the extremely violent conflict in the DRC Region, which has been partially financed by the exploitation and trade of 3TG originating in the DRC Region.

Commitment

Matrix Comsec Pvt Ltd is committed to complying with this legislation and is taking steps to comply with the regulations. It requires all our suppliers to conform to our “Conflict free” Policy and requires immediate corrective action from suppliers who violate of this requirement. Suppliers must provide written evidence of due diligence documenting that materials and components supplied do not contain gold, tin, tantalum and tungsten that originate from mining or smelting operations in the conflict region. With suppliers who do not meet the “Conflict free” requirements, Matrix Comsec Pvt. Ltd. will with either take cooperative actions or terminate relations with the supplier.

Matrix Comsec Pvt. Ltd. and its approved suppliers do not knowingly use any materials from conflict mines and will regularly query/audit suppliers to verify our requirements to enforce compliance.