Conflict Minerals Policy

Conflict Minerals SEC Dodd Frank Section 1502 of the Dodd-Frank Act was signed into law on July 21, 2010. This law requires publicly traded companies to ensure the raw materials they use are not tied to conflict minerals. This was done in order to dissuade companies from engaging in trade that supports regional conflicts.

Conflict minerals and their derivatives are those which contain or utilize 3TGs (tantalum, tin, tungsten or gold) and originate from the Democratic Republic of Congo (DRC) or a country that shares an internationally recognized border. Presently, this includes Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

Based on the latest information available, Polar Technology Management Group Ltd does not knowingly purchase from suppliers that use 3TGs originating from the DRC and/or its adjoining countries.

Signed:

Scott Roberts
Chairman

Mike Dewhirst
Chairman