

**senior**  
**Aerospace**  
**Ketema**  
**Division of Senior Operations LLC**

Conflict Minerals Policy

Senior Aerospace expects its suppliers to maintain a policy to reasonably ensure that the columbite-tantalite, also known as coltan, cassiterite, wolframite, tantalum, tin, tungsten, & gold (if present) contained within the product that they manufacture and supply to Senior Aerospace are “conflict free”.

“Conflict free” means any “conflict minerals” (gold, columbite-tantalite, also known as coltan, cassiterite, wolframite, or their derivatives: tin, tantalum or tungsten) necessary to the functionality or production of the supplied products, either do not originate from the “Conflict Region” situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries or are from recycled or scrap sources.

Senior Aerospace does not knowingly procure products containing any of the above-specified metals that originate from facilities in the “Congo Region” that are not certified as “Conflict Free”.

Effective 01/01/2014, Senior Aerospace publicly declared its commitment to a “Conflict free” supply of products & materials to support the EICC (Electronic Industry Citizen Coalition) & GeSI (Global e-Sustainability Initiative)

Although Senior Aerospace is not regulated under the Securities Exchange Commission’s (SEC) Conflict Mineral rules, we understand that many of our customers are; which requires us to maintain the same requirements as theirs in addition to our commitment to our moral & ethical responsibilities.

Senior Aerospace requires their suppliers to certify through their declaration form (REF-CM(F) 01) that they are compliant with Senior’s conflict mineral program.

Suppliers to Senior Aerospace must adopt a policy regarding conflict minerals that is consistent with Senior Aerospace’s policy and require their management systems to support compliance with their policy while requiring their own suppliers to also take the same measure to ensure they too have a policy with the same results.

The responsibility must be carried out by each level of supplier from the final destination / customer all the way back to the actual mining or extraction methods of the minerals to ensure compliance.

Senior Aerospace expects suppliers to establish their own due diligence program to ensure that the specified metals are being sourced only from smelters outside of the “Conflict Region” or from smelters which have been certified by an independent third party as “Conflict free” if sourced within the “Conflict

Region". Smelters are qualified as "Conflict free" if validated as compliant to the EICC Conflict free smelter (CFS) protocol, using the CFS Compliant Smelter List.

Senior Aerospace expects suppliers to maintain compliance systems and be able to demonstrate a satisfactory record of written evidence (if required) to support their due diligence program. Senior Aerospace may in its sole discretion assess & monitor ongoing performance and compliance with its conflict minerals policy, including but not limited to a review of appropriate supplier documents and review of past practices of the supplier.

Suppliers to Senior Aerospace are required to supply written confirmation that the products that they supply are "Conflict free" and to complete our supplier certification. Submittal of the SEC-GeSI (general template) of conflict mineral reporting may be accepted in lieu of Senior Aerospace's declaration form as long as it is signed by an authorized officer of such supplier.

Senior Aerospace suppliers are expected to pass on a similar conflict minerals declaration or required a form of the general template on to their suppliers as well to ensure supply chain compliance to the program.

If Senior Aerospace discovers the use of conflict minerals produced in facilities that are considered to be "Non-Conflict free" in any supplied products or being used at any point in the supply chain they will take appropriate action to transition the supply of these products to a "Conflict free" source.

Further: Senior Aerospace will at the discretion of the General Manager/ CEO & CFO and with corporate guidance share the issue with the end user or customer to make them aware of the non-conformance to the program.