

## Conflict Minerals Policy

ShockWatch, Inc. supports the objectives of Section 1502 of the federal Dodd-Frank Wall Street Reform and Consumer Protection Act as implemented by United States Securities and Exchange Commission Rule 13p-1, which requires public reporting companies to make certain disclosures concerning use in their manufactured products of “Conflict Minerals” derived from sources that are believed to directly or indirectly finance armed conflict or benefit armed groups within The Democratic Republic of the Congo or certain adjoining countries.

“Conflict Minerals” at present includes: columbite-tantalite (coltan) (e.g., tantalum), cassiterite (e.g., tin), gold, wolframite (e.g., tungsten) and their derivatives, and could expand to include other minerals or their derivatives as may be determined by the United States Secretary of State.

ShockWatch, Inc. intends to avoid, wherever feasible, the use in manufactured products of Conflict Minerals derived from sources that are believed to directly or indirectly finance armed conflict or benefit armed groups within the Democratic Republic of the Congo or certain adjoining countries. To that end, ShockWatch, Inc. intends to solicit declarations from suppliers with respect to use of Conflict Minerals in a manner consistent with guidelines developed by the Electronic Industry Citizenship Coalition and the Global e-Sustainability Initiative. In brief, suppliers will be requested to declare that products supplied to ShockWatch, Inc. either:

1. Do not contain tantalum, tin, tungsten or gold that is necessary to their production or functionality; or
2. Do contain tantalum, tin, tungsten or gold that is necessary to their production or functionality and that originates from non-conflict areas or from smelters that have been validated by a generally recognized independent public or private sector party to be conflict-free.

Suppliers are responsible for conducting Conflict Minerals due diligence with respect to their own supply chains in support of such declarations.

ShockWatch, Inc. reserves the right to request additional documentation and data from suppliers regarding the sourcing and traceability of any Conflict Minerals included in products. ShockWatch, Inc. recommends that Suppliers maintain sourcing and traceability documentation and data with respect to Conflict Minerals for a minimum of five years.

ShockWatch, Inc. intends to evaluate relationships with its suppliers on an ongoing basis, in part with respect to compliance with this policy.



**Gerard Smith**  
Chairman & Chief Executive Officer