



limited liability company
Novosibirsk tin works
Ltd «NOK»

Reliability, Responsibility, Quality since 1942

Russia, 630033, Novosibirsk, Mira street,62
tel: (383) 349-11-08, fax: 349-11-01, E-mail: email@nok.ru

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Policy on conflict minerals

1. Introduction

1.1 Objectives

The company "NOC" is committed to the principles of compliance with the recent amendments to the law the Dodd-Frank "On the reform of the financial system and protect the rights of consumers" and related regulations of the Securities and Exchange Commission (SEC), aimed at preventing the use of minerals, which are directly or indirectly finance or support armed groups in the Democratic Republic of the Congo (DRC) and neighboring countries (Sudan, Uganda, Rwanda, Burundi, the united Republic of Tanzania, Zambia, Angola, the Central African Republic).

The Dodd-Frank law and the SEC rule obliges listed companies to provide information on whether they use tantalum, tin, tungsten or gold obtained from the DRC or a neighboring country. If this is the case, then companies should submit a report indicating the products containing minerals the extraction of which is related to the conflict, as well as their due diligence measures aimed at identifying the supplier and supply chain of these minerals.

The term "non-conflicting" means products that do not contain tantalum, tin, tungsten or gold, which directly or indirectly finance or support armed groups in the DRC or neighboring countries.

1.2. Area of distribution

The company LLC "NOC" and all its units around the world.

2. Policy on conflict minerals

2.1 Statement on the policy of NOC LLC

As a manufacturer of metal tin, solders and babbits, LLC NOC is committed to the principles of selecting suppliers of components and materials that adhere to our values regarding respect for human rights, business ethics and environmental responsibility.

LLC "NOC" does not purchase goods and raw materials directly or through intermediaries from the Democratic Republic of the Congo (DRC) and other conflict zones, as well as raw materials and goods supplied from countries that are subject to economic sanctions, from countries where child labor or other illegal and unethical practices.

In this regard, the company "NOC" does not allow for any direct or indirect support to armed groups in the DRC, criminal groups or perpetrators of serious human rights violations and / or authorized individuals or organizations for the entire production process, sale, processing and consumption of minerals. LLC "NOC" requires all suppliers to use only metals obtained through a proven supply channel, so that they do not finance the conflict at any time.

2.2 Obligations of employees

In an effort to maintain a supply chain that is not related to the conflict, the employees of NOC LLC make every effort to identify the supplier and plan the supply chain of its minerals.

Employees engaged in engineering and research activities are prohibited from using materials or components supplied from the DRC or neighboring countries, and they must, in accordance with the established procedure, formalize their compliance with regulatory requirements. In addition, all employees of NOC LLC seeking to find suppliers of products or components of third-party manufacturers, irrespective of the department, should introduce measures to control the supply of minerals not related to the conflict in the DRC, and to involve in this process the selection of the supply group and logistics for each area of activity.

Employees need to receive credible explanations from suppliers about the fact that their conflict minerals were not extracted in the DRC of neighboring countries.

Employees should exercise reasonable skepticism and good judgment when evaluating comments providers and do not forget about any reason to doubt, which may indicate the facts, contrary to the supplier's declaration, for example, in respect of prices for raw materials, the location provider, purity or quality of the raw materials used for production products, etc.

Employees are explicitly prohibited from purchasing from suppliers of metals components or raw materials, either knowingly supplied from conflict regions, or declared as related to the conflict in the DRC.

Employees should use commercially justified methods, such as determining alternative sources of supply, stopping procurement from suppliers if they establish the risk that accompanies these purchases, or linking suppliers to a counterpart who has committed human rights violations in the DRC or neighboring countries.

2.3 Confirmation of employees' compliance with this policy

Employees of NOC LLC, responsible for the processes of technical design, research and development, production or search for suppliers of raw materials for the manufacture of products, must at least once a year sign the confirmation in the form established solely at the discretion of the legal department, indicating compliance with this policy .

A handwritten signature in blue ink, appearing to be 'Leonid', is centered on the page. The signature is written in a cursive style with a prominent initial 'L'.

**Director of LLC "NOC"
Leonid**

Mr. Vermienko