

CONFLICT MATERIALS POLICY



The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“ACT”). The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

As a global assembler of custom bulk cable, wire harnesses, and electromechanical assemblies, Vermillion Inc. and Affiliates (“Vermillion”) promotes the traceability of these minerals and the transparency of the supply chain. While Vermillion, as an assembler of purchased components, is not able to certify as to the country of origin of the minerals contained in the products manufactured by Vermillion's suppliers, Vermillion is committed to working with its customers to supply products that meet the customer's specifications by requiring Vermillion's vendors to disclose the country of origin of the minerals covered under the ACT. These disclosures will be made available to our customers, on request, to the extent that Vermillion has received them from our vendors.

Vermillion's policy is to not knowingly purchase products that contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Vermillion has issued a statement to our suppliers and expects its supplier's to only source minerals from responsible sources. Vermillion fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a conflict free supply chain. We are encouraging all of our suppliers to likewise support these efforts and make information on the origin of their product components easily accessible.