

		MTI Instruments Inc. 325 Washington Ave. Ext Albany NY, 12205	
Document Name:	Conflict Minerals Policy Procedure	Issue Date:	05/24/2021
Document Number:	A0810	Revision:	1.4

Conflict Minerals Policy Procedure

Record of Revision		
Rev. No.	ECN No.	Description of Change / Affected Page / Paragraph
1.0	4198	Initial Release
1.1	4470	Update to Section 4
1.2	5320	Updates to Section 1, 4, 5.3 and 6.3
1.3	5647	Update to Section 5.3, Accounting Manager
1.4	7156	Update to current ISO Document formatting, Section 1, 4, 5.3 and 7

1.0 Purpose

To provide a policy for MTI Instruments comply with Rule 13p-1 promulgated under the Securities Exchange Act of 1934.

2.0 Scope

This policy applies to MTI Instruments and all products manufactured by MTI Instruments.

3.0 Associated Documents

None

4.0 General Definitions

Conflict Minerals	Those minerals defined as Conflict Minerals in SEC Form SD. As of May 21, 2021, these are columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives, which are limited to tantalum, tin, and tungsten.
Covered Countries	Countries covered by Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended are the Democratic Republic of the Congo (DRC) and adjoining countries, which as of May 21, 2021 include the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, and Angola.
MTII Parts	Parts designed by or specifically for MTI Instruments. These are parts that MTI Instruments “contracts to manufacture” and, therefore, over which MTI Instruments has influence in the manufacturing of. An example of an MTII Part would be a machined part for an instrument or sensor.
Catalog Parts	Parts not designed by or specifically for MTI Instruments. These are parts over which MTI Instruments has no influence over the manufacturing of. An example of a Catalog Part would be electronic components used in MTII products that are purchased from distributors.

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5.0 Responsibilities

5.1 Engineering Management

- Determine which MTII Parts contain Conflict Minerals and communicate that information to Purchasing.

5.2 Purchasing

- Request Conflict Mineral report information from vendors of MTII Parts where Conflict Minerals are used.
- Keep vendor Conflict Mineral information filed appropriately.

5.3 Compliance Manager

- Facilitate the generation of Form SD per SEC requirements.
- File Form SD as required.
- Make Form SD available via <http://www.mechtech.com> and <http://www.mtiinstruments.com>

6.0 Instructions

6.1 Policy regarding Covered Countries:

- MTI Instruments will not purchase materials directly from the Covered Countries.
- MTI Instruments will not buy materials that are known to contain Conflict Minerals sourced in Covered Countries.

6.2 Policy regarding Conflict Minerals:

- When practical and reasonable, MTI Instruments will attempt to avoid Conflict Minerals in the design of MTII Parts.
- Engineering will inform Purchasing when a MTII Part contains Conflict Minerals.
- Suppliers of MTII Parts that do contain Conflict Minerals will be queried with regards to their Conflict Minerals sourcing.
- Supplier Conflict Mineral sourcing information will be kept on file by Purchasing.

6.3 Disclosure:

- Securities and Exchange Form SD will be filed pursuant to 17 CFR 240.13p-1.
- This report will be available on <http://www.mechtech.com> and <http://www.mtiinstruments.com> after filing.

7.0 Record Retention

See QAP-1 for the information regarding record retention times.

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