



Conflict Minerals Policy

In August, 2012, the U.S. Securities and Exchange Commission (SEC) adopted regulations under the Dodd-Frank Wall Street Reform and Consumer Protection Act, requiring the reporting and disclosure by all publicly traded companies, regarding the use of “Conflict Minerals” which are necessary to the functionality or production of a product they manufacture or contract to manufacture.

While we have no direct reporting requirements, Align Aerospace is committed to supporting its customers in fulfilling their legal obligations under the “Conflict Minerals” rule. Align’s suppliers are expected to adopt policies and management systems to reasonably assure that the tantalum, tin, tungsten and gold (3T&G) in the products they manufacture are conflict free and to require their suppliers to adopt similar policies and systems.

In furtherance of Align’s commitment to its customers, Align has implemented the following steps:

- Survey its supply base annually, using the industry standard Conflict Minerals Reporting Template (CMRT) in accordance with the OECD Due Diligence Guidance recommendations.
- Work with suppliers when incorrect or non-compliant information is received to correct and improve the information supplied.
- Should any supplier continue to provide incorrect or non-compliant information and not commit to a remediation plan, we have an escalation process in place that will consider our options, including reassessment of the supplier relationship.