



**December 13, 2017**

**Subject:** Portage Electric Products, Inc. Conflict Minerals Policy Statement

The Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into U.S. federal law on July 21, 2010. Section 1502 of this Act defines reporting obligations for companies that are publically traded within the United States and are governed by the Securities and Exchange Commission. Section 1502 requires companies that make products that contain “conflict minerals” such as tantalum, tin, tungsten, and gold must publically report that these minerals are not sourced from the Democratic Republic of Congo (DRC) or from an adjoining country or if they are from recycled or scrap sources.

As Portage Electric Products, Inc. is not a publically traded company and therefore not subject to this law. Portage Electric does not directly source tantalum, tin, tungsten, or gold but these minerals may be included in the components we purchase from our suppliers. Portage Electric does expect our suppliers to have policies in place and take due diligence measures that will enable us to reasonably assure that materials and components supplied to us containing any conflict minerals are DRC free.

Portage Electric expects our suppliers to comply with the Electronic Industry Citizenship Coalition (EICC) Code of Conduct. In support of this policy, Portage Electric will exercise our own due diligence by contacting our suppliers to verify their continued compliance to the existing regulations.

Based on the information we have received thus far, we declare that if our products contain any conflict minerals, they are sourced from conflict free areas.

Sincerely,

**Portage Electric Products, Inc.**

Brandon L. Wehl  
Chairman & CEO