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ILC Conflict Materials Sourcing Policy

The purpose of this document is to provide guidance in sourcing materials not originating from conflict regions - Democratic Republic of Congo (DRC) or adjoining countries.

Intelligent Lighting Controls, Inc is committed to complying with any applicable requirements under the Conflict Minerals Rule and has implemented a due-diligence process to meet its obligations under the legislation.

Reference: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. See also "Conflict Minerals Rule."

"Conflict minerals" refers to columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location or origin of the minerals or derivative metals.

ILC Policy Requirements:

New Supplier Criteria

New Supplier approval is dependent on sourcing materials not originating from the Democratic Republic of Congo (DRC) or adjoining countries.

Survey of existing suppliers

Survey(s) may take place at request for suppliers to verify and respond on status of material sourcing, ensuring materials are not sourced from the Democratic Republic of Congo (DRC) or adjoining countries.

Communication of this Policy

Intelligent Lighting Controls, Inc resources responsible for sourcing materials, authorizing purchases and authorizing new suppliers must be provided direct awareness and ongoing access to this policy.

Approved by: President, Jay Carlson

Signature:

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