



Conflict Minerals Declaration

Subject: Conflict Mineral Declaration for Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502

The Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into U.S. federal law on July 21, 2010. Section 1502 of the Act defines the reporting obligations for companies that are publicly traded in the US and are governed by the Securities & Exchange Commission (SEC). Section 1502 requires companies that make products for which 3TG minerals (tantalum, tin, tungsten and gold) are necessary to the functionality or production of that product to assess their supply chains and publically report on the source of these minerals if they are sourced from the Democratic Republic of Congo (DRC) or adjoining country or if they are from recycled or scrap sources.

Although Tef Cap Industries is not a publically traded company, and therefore not directly subject to this law, we are providing this declaration to our downstream customers to help them comply with any obligations relative to this law. Tef Cap Industries Conflict Minerals Program is implemented with guidance obtained from the Final Rules of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

This document declares that all of the products manufactured by Tef Cap Industries are free of any materials listed as Conflict Minerals or 3TG and are registered "DRC conflict free".

These Conflict Minerals are:

- Tantalum (Columbite-Tantalite)
- Tin (Cassiterite)
- Tungsten (Wolframite)
- Gold

A handwritten signature in black ink that reads "C Walls".

Christopher Walls
Quality Control
Tef Cap Industries Inc.



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Conflict Minerals Reporting Template (CMRT)

English

Revision 5.11
 April 27, 2018

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	TEF CAP INDUSTRIES
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	1155 PHOENIXVILLE PIKE, SUITE 103
Contact Name (*):	CHRIS WALLS
Email - Contact (*):	CNW@TEFCAP.COM
Phone - Contact (*):	610-692-2576
Authorizer (*):	CHRIS WALLS
Title - Authorizer:	
Email - Authorizer (*):	CNW@TEFCAP.COM
Phone - Authorizer (*):	610-692-2576
Effective Date (*):	1-Jan-2019

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum	NO	
Tin	NO	
Gold	NO	
Tungsten	NO	

2) Does any 3TG remain in the product(s)?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

5) What percentage of relevant suppliers have provided a response to your supply chain survey?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

6) Have you identified all of the smelters supplying the 3TG to your supply chain?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		



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7) Has all applicable smelter information received by your company been reported in this declaration?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy?		
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.)		
C. Do you require your direct suppliers to be DRC conflict-free?		
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?		
E. Have you implemented due diligence measures for conflict-free sourcing?		
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?		
G. Do you review due diligence information received from your suppliers against your company's expectations?		
H. Does your review process include corrective action management?		
I. Is your company required to file an annual conflict minerals disclosure with the SEC?		