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Synapse Responsible Mineral Sourcing Policy

Section 1502 of the [Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010](#) (“Dodd-Frank Act”) requires publicly traded companies to report annually on the presence of conflict minerals originating in the Democratic Republic of Congo (DRC) or adjoining countries in Africa in the products they manufacture or contract to manufacture. Conflict in this region has been funded, in part, by the mineral resources trade, which has led to extreme human rights abuses. The Conflict Minerals provision described in Section 1502 targets products containing tin, tantalum, tungsten, and gold (referred to as “3TG”) which originate from this troubled region.

While Synapse is a privately held company and not specifically bound by the requirements in the Conflict Minerals provision, we believe the goals of this legislation, and responsible sourcing in general, are consistent with our commitment to ethical business practices and the protection of basic human rights for our employees and those within our supply chain. Synapse does not procure minerals from mines or smelters. However, Synapse does exercise discretion over the choice of components that may contain such minerals and contract manufacturers who produce our products with them. As a result, Synapse has established a Conflict Minerals Compliance program and is committed to providing awareness to appropriate personnel and to performing due diligence within the supply chain. [Synapse Terms and Conditions](#) also require that suppliers comply with the Conflict Minerals provision of the Dodd-Frank Act along with environmental and international trade laws. To ensure that Synapse achieves the goal of responsible sourcing with regards to 3TG, we will:

- Train appropriate personnel on this policy and the human impact of the Conflict Minerals trade,
- Engage in ongoing assessment of the supply chain of Synapse products with the support of suppliers and third-party compliance partners to identify and mitigate conflict minerals risks,
- Require our supply chain to purchase 3TG from smelters and refiners that conform to the requirements of the [Responsible Minerals Assurance Process](#), and
- Include participation and level of support in Conflict Minerals compliance during contract manufacturer performance evaluation.