

NIKKISO CRYO

Conflict Minerals Policy

Nikkiso Cryo is committed to complying with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("**Section 1502**") relating to the use of tantalum, tin, tungsten and gold (referred to as "**conflict minerals**") in its products. Section 1502 requires companies publicly traded in the U.S. that manufacture or contract to manufacture products in which conflict minerals are necessary to their functionality or production to conduct a reasonable country of origin inquiry into whether such conflict minerals originated from the Democratic Republic of the Congo or adjoining countries (collectively, the "Covered Countries") and to make specialized disclosures regarding its findings. In addition, if companies have reason to believe the conflict minerals may have originated from the Covered Countries, they are required to conduct due diligence on the source and chain of custody of such conflict minerals.

Nikkiso Cryo has an extensive and varied supply chain and, like other companies in the electronics industry, purchases certain products or components that include conflict minerals. Nikkiso Cryo is committed to responsible sourcing of minerals and has taken action to increase transparency in its supply chain and ensure responsible procurement by its suppliers and sub-suppliers.

Nikkiso Cryo conducts conflict minerals due diligence pursuant to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The Company works with its main suppliers to trace mineral flows in the supply chain. Nikkiso Cryo has adopted the standardized RMI conflict minerals reporting template to map and monitor suppliers' commitment and activities, has incorporated principles of this conflict minerals policy into contractually binding purchasing terms and conditions, and works with suppliers to increase transparency in the supply chain.

The Company's suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global mineral supply chains. Nikkiso Cryo expects suppliers to take all reasonable steps to identify and assess risk in their supply chain, to make continued efforts to ensure that conflict minerals that directly or indirectly finance or benefit groups in Covered Countries are not used in products sold or supplied to Nikkiso Cryo and to cooperate with the Company's supply chain due diligence by completing in a timely manner the standardized conflict minerals reporting template each year covering all of the products supplied to Nikkiso Cryo in that year.

Suppliers and other external parties are invited to contact Nikkiso Cryo or their regular sourcing channel should they wish to seek further guidance or report concerns regarding conflict minerals