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	DEPARTMENT: Quality	SECTION: Environmental	Department Director Enrique Vasquez
SUBJECT: Conflict Minerals			


Conflict Minerals Sourcing Policy

Coto Technology, as a private company that is not publicly-traded, is not legally subject to the U.S. Securities and Exchange Commission’s provisions for conflict minerals. However, **Coto Technology** is aware of the Dodd-Frank Wall Street Reform and Consumer Protection Act which imposed new supply chain reporting requirements on U.S. publicly traded companies to promote transparency and consumer awareness regarding the use of “conflict minerals” (tantalum, tin, gold and tungsten, or “3TG”) that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) region.

As required by the Dodd-Frank Act, the U.S. Securities and Exchange Commission (SEC) has adopted rules requiring publicly traded companies to disclose whether they use 3TG that originated in the DRC or an adjoining country and if so, to issue a report identifying their products that are not conflict free and their due diligence efforts to determine the country of origin and chain of custody of the metals. Conflict free means the product does not contain 3TG that directly or indirectly finances or benefits armed groups in the DRC or an adjoining country.

Coto Technology like many companies in electronic product industries, uses some of these materials in the manufacturing of our products as they are required for functional performance. Coto Technology does not purchase these metals directly from smelters or mines; we rely on source information provided by our suppliers. We have contracted with GreenSoft Technology (www.greensofttech.com) to work with our suppliers to collect sourcing and due diligence information related to Conflict Minerals. This includes generating a Conflict Minerals Report for all interested Coto Technology customers.

If **Coto Technology** becomes aware of a supplier whose supply chain includes metals from a conflict source, Coto Technology reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier. Coto Technology expects our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.


 Jeff Bentley 3/20/20
 Coto President


 Enrique Vasquez
 Quality Director

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