

API Technologies Conflict Minerals Policy

API Technologies supports the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 Conflict Minerals, which aims to prevent the use of smelters and mines that directly or indirectly support armed groups in The Democratic Republic of the Congo (DRC) and/or adjoining countries (as defined in the Act). API Technologies is committed to avoiding the use of conflict minerals which directly or indirectly finance or benefit armed groups in the DRC and/or adjoining countries. API Technologies is committed to complying with the reporting obligations required under Section 1502 of the Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission, including the requirement that API Technologies conduct inquiries into the source of any conflict minerals included in its products.

Suppliers will be required to declare that all products supplied either:

1. Do not contain tantalum, tin, tungsten or gold that are necessary to their production or functionality, or,
2. If they do contain these minerals that they originate from non-conflict areas or from smelters that have been validated by an independent private sector party to be conflict free.

API Technologies is collecting our suppliers' conflict minerals data through our supplier portal. There are multiple options on how our suppliers submit the data through the portal:

1. Upload the supplier conflict minerals statement.
2. Upload the supplier conflict minerals EICC form.
3. Complete the on-line template available on the portal.
4. Any combination of the above.

API Technologies Expectations for Suppliers:

1. Supply DRC conflict free materials.
2. Annual submission of conflict mineral status through the API Technologies supplier portal.
3. Adopt a conflict minerals policy.
4. Annually collect conflict minerals data from their suppliers.

API Technologies will evaluate its relationships with its suppliers to ensure suppliers are conforming to the conflict minerals policy. API Technologies reserves the right to request additional documentation from its suppliers regarding the source of any conflict minerals included in its products. In addition, suppliers must maintain and provide to API Technologies upon request traceability data for a minimum of five years. Suppliers who do not comply with these requirements shall be reviewed by API Technologies' supply chain organization for future business.

API Technologies subsidiaries:

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| a. Spectrum Control | j. API Defense USA |
| b. Spectrum Microwave | k. API Systems |
| c. Spectrum FSY Microwave | l. API Cryptek Inc. |
| d. Spectrum SEI Microwave | m. Emcon Emanation Control Ltd. |
| e. Spectrum Control de Mexico | n. Filtran Ltd. |
| f. Spectrum Control Limited (Hong Kong) | o. RF2M Microwave Ltd. |
| g. Spectrum Control GmbH | p. Cryptek Holdco UK Limited |
| h. CMT Filters | q. Secure Systems & Technologies, Ltd. |
| i. SenDec Corporation | r. RF2M Microelectronics Ltd. |