



Statement on Conflict Minerals

Lycus Ltd is committed to conducting our business activities in accordance with the highest legal and ethical standards. We are also committed to sourcing materials from suppliers that share our values.

Lycus Ltd is concerned that trade in certain minerals mined in regions of the Democratic Republic of Congo and adjoining countries (“Covered Countries”) and metals refined from those minerals – tantalum, tin, tungsten and gold (“3TG”) -- may be contributing to human rights abuses. In an effort to combat these abuses, Congress passed section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the U.S. Securities and Exchange Commission approved a final rule regarding the sourcing of 3TG from Covered Countries. Under the rule, our customers who maybe publicly traded companies must annually report to the SEC, beginning on May 31, 2014, the presence of 3TG originating from Covered Countries in the products they manufacture or contract to manufacture if the 3TG is necessary for the functionality or production of a product.

Lycus Ltd is engaged in a comprehensive process to meet this regulatory obligation including taking steps to increase our supply chain due diligence measures and internal controls for 3TG. We are utilizing due diligence techniques to assess whether materials we purchase contain 3TG, and where appropriate, collecting sourcing information through industry standard formats such as the Electronics Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI).

Lycus Ltd - Position on the Use of 3TG

Lycus Ltd is committed to working with our suppliers to determine whether our purchased materials contain 3TG from a Covered Country, and if so, to confirm that the use of such minerals does not directly or indirectly finance or benefit armed groups, and to fully complying with the SEC reporting requirement.

Lycus Ltd - Expectations for Suppliers

- Suppliers are expected to supply materials to Lycus Ltd that are “DRC conflict free” which means: 1) any 3TG necessary to the functionality or production of materials must not directly or indirectly fund armed conflict in the Covered Countries or 2) any 3TG must be from recycled or scrap sources.
- Adopt conflict minerals policy. Suppliers to Lycus Ltd must adopt a policy regarding 3TG that is consistent with Lycus Ltd’s policy, implement management systems to support compliance with their policy, and require their suppliers to take the same steps.
- Develop supply chain due diligence and provide responses to Lycus Ltd. Respond to Lycus Ltd’s due diligence requests in a timely manner providing current and accurate information, updating as need to ensure continuing accuracy.

Concerns regarding this policy or any potential violations of this policy may be reported to Lycus Ltd.