



Global Policy on Conflict Minerals

Objective

Consistent with Transcat, Inc.'s (Transcat) Global Human Rights Policy, Transcat supports the efforts of the U.S., E.U., and other governments and international organizations around the world to end human rights abuses associated with continuing violent conflicts that may be funded through the sale of certain minerals. "Conflict Minerals" generally refers to the minerals cassiterite, columbite-tantalite, wolframite and gold and derivatives of these minerals such as tantalum, tin, and tungsten sourced from the Democratic Republic of the Congo (DRC), or any adjoining country. Transcat is committed to utilizing supply chain partners with products that are "DRC conflict free", meaning that their products do not contain minerals that directly or indirectly finance or benefit armed groups in the DRC.

Scope

Transcat, as referred to in this Policy, means Transcat and its subsidiaries.

Policy

1. Transcat requires that all raw materials used by it be sourced responsibly and in accordance with this Policy.
2. While Transcat's supply chain is complex, the composition of some raw materials is proprietary and all the components used to make the raw materials that we use may not be known, Transcat requires that all suppliers and supply chain partners:
 - a. Review and acknowledge its' Supplier Code of Conduct;
 - b. Provide all information necessary for Transcat to document our compliance with disclosure requirements under applicable laws with regards to Conflict Minerals;
 - c. Practice responsible sourcing of raw materials and constituent components to assure that no Conflict Minerals or other minerals are sourced that directly or indirectly finance armed conflict in the DRC or other covered countries.
3. Transcat expects the following of its suppliers:
 - a. Suppliers and supply chain partners shall not supply Transcat with any Conflict Minerals.
 - b. Suppliers and supply chain partners shall develop and put in place policies, procedures, and management processes, including reasonable due diligence frameworks and policies, to prevent the entry of Conflict Minerals into the supply chain and shall provide the necessary documentation to Transcat as to origin to confirm DRC conflict free classification of any minerals that may be used in Transcat's supply chain.
 - c. Suppliers and supply chain partners shall provide Transcat with documentation and accurate information as to the source of any minerals which could be Conflict Minerals within the supply chain and the steps undertaken to obtain that verification. Such verification may include recognized, independent, third party verification.
 - d. Suppliers shall immediately advise Transcat if it is determined that any materials in the supply chain contain Conflict Minerals or minerals that directly or indirectly finance or benefit armed groups in the DRC.



Administration of the Policy

1. Transcat will develop, implement, and communicate the management processes and procedures required to comply with this Policy. The Policy will be reviewed at regular intervals by senior management of Transcat.
2. Transcat communicates its expectations with respect to this Policy to its supply chain and business partners.
3. Transcat communicates this Policy to any employees who interact with our supply chain and business partners.
4. Transcat will conduct periodic reviews of our facilities and supply chain and business partners with respect to the implementation of this Policy. Should any violations of this Policy be determined, Transcat senior management will review the findings to determine the course of action to be taken which may include suspending conduct of business until the violation is remediated, working with the supply chain or business partner to remediate the violation as part of longer-term plan or discontinuing business with a violating company.
5. This Policy is administered internally by Transcat's Legal Department. Any questions regarding this Policy should be directed to Transcat's General Counsel.