



January 1, 2021

To Whom It May Concern:

In 2010 Congress passed the Wall Street Reform and Consumer Protection Act, also known as the Dodd / Frank Wall Street Reform Act. Section 1502 of that Act contained a disclosure requirement for public corporations, that calls on them to determine whether their products contain conflict minerals – by carrying out supply chain due diligence – and to report this to the Securities and Exchange Commission.

Conflict minerals are defined as Tungsten, Tin, Tantalum and Gold mined in the Democratic Republic of the Congo (DRC). It is our understanding that this is reporting requirement, not an embargo or ban on the use of these minerals from the DRC.

PCNA, as a private company, is not subject to the requirements of this Act. Our visibility and control into our supply chain does not extend back thru multiple levels, to the countries of mineral extraction. We support the Act's efforts to choke off sources of revenue to groups engaged in extreme acts of violence against the people of that region, and we take every step at our disposal to ensure that our products are manufactured in a legal, responsible manner. We are unaware of any of our products having its mineral source in that region, but given the nature of intertwined global supply chains, we cannot with certainty say where the raw minerals might have come from.

Additionally, the Dodd Frank Act has excluded promotional products, such as we sell, from the requirements of the act. The Securities Exchange Commission has published a FAQ addressing this point at <http://www.sec.gov/divisions/corpfin/guidance/conflictminerals-faq.htm>

**(4) Question:**

Is an issuer that specifies that its logo be etched into a generic product that is manufactured by a third party considered to be “contracting to manufacture” the product?

**Answer:**

No. The Commission in the adopting release stated that an issuer is not considered to be “contracting to manufacture” a generic product if its actions involve no more than “affixing its brand, marks, logo, or label to a generic product manufactured by a third party.” Etching or otherwise marking a generic product that is manufactured by a third party, with a logo, serial number, or other identifier is not considered to be “contracting to manufacture.”

While we acknowledge that many customers or their end customers may be public companies, subject to the reporting requirements of this Act, our promotional products are not subject to it, and we are not able to determine the original source of minerals that might be used in the manufacture of our products.

Sincerely,

David Nicholson  
President

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