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NOVACAP CONFLICT MINERALS POLICY

In the Democratic Republic of the Congo (DRC) or adjoining countries, the mining of minerals used to produce tantalum, tin, tungsten and gold (known as 3TG minerals) has been linked to funding armed groups engaged in violent conflict in the DRC region.

As part of Novacap's commitment to social responsibility and compliance with Rule 13p-1 under the Securities Exchange Act, it is our goal to only use 3TG minerals in our products that do not directly or indirectly finance or benefit armed groups in the DRC region.

Novacap does not knowingly source any product containing Conflict Minerals from the DRC. We are taking steps to ensure the use of conflict-free 3TG minerals in our supply chain by expecting our suppliers to:

- Adopt a conflict minerals policy that is consistent with this Policy and require their direct and indirect suppliers to do the same.
- Exercise due diligence with relevant suppliers on the source and chain of custody of 3TG minerals consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Identify smelters/refiners associated with the 3TG mineral supply chain for our products.
- Transition to certified conflict-free smelters/refiners.

December 5, 2016

Mark Skoog President

Patrice Jailieth

Patrice Galliath Operations Manager