

Gemini Gas Springs Inc. P.O. Box 1023 Vernon BC V1T 6N2 1-6276 Pleasant Valley Rd Vernon BC V1B 3R3

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CONFLICT MINERALS POLICY

The Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 imposes Securities and Exchange Commission (SEC) reporting requirements (17 CFR Parts 240-249(b)) upon manufacturers if their product(s) contain metals derived from minerals defined as "Conflict Minerals."

Our Supplier Code of Conduct defines our principles and commitment toward legal compliance, ethical conduct, anticorruption, labour and environmental protection.

We want to ensure that all components, parts and materials used to manufacture our products contain minerals from conflict-free sources. We do not tolerate, or profit from, contribute to, assist with or facilitate any activity included child labour that violates human rights. We have no tolerance for corruption, money-laundering and bribery.

Gemini Gas Springs Inc. certifies that it has not provided, and will not provide, clients with any products or materials that contain such Conflict Minerals. In the event that we have reasons to believe or suspect that it may have Conflict Minerals in its products or materials, we shall immediately notify client in writing and provide basis for its knowledge or belief.

NO 3TG MINERALS SOURCED FROM COVERED COUNTRIES

As a duly-authorized representative of Gemini Gas Springs inc., I hereby represent and certify that Gemini Gas Springs Inc. does not and will not provide clients with materials or products containing Tin, Tantalum, Tungsten or Gold (known as "3TG minerals") sourced from the Democratic Republic of Congo or adjoining countries (known as "Covered Countries") as described in the Securities and Exchange Commission's final rules governing Conflict Minerals set forth at 17 CFR Parts 240-249(b), promulgated pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Policy will be reviewed regularly and updated if required. We will comply with legal requirements of our conflict minerals due diligence process and disclose any conclusions with respect to mineral supply chain

Our employees, suppliers and third parties can report concerns and alleged violations of this Policy to:

- A written letter to: Gemini Gas Springs Inc. P.O. Box 1023, V1T 6N2 Vernon BC, Canada
- By email to: info@geminigassprings.com
- +1 778-475-5611

Any report of violations will be treated with utmost confidentiality

Henk Blok

President

Gemini Gas Springs Inc.