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Conflict Minerals Policy Statement

We support ending the violence and human rights violations in mining certain minerals from a location described as the “Conflict Region,” which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. As a result, the U.S. Securities and Exchange Commission (SEC) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals” as directed by the Dodd-Frank Wall Street and Consumer Protection Act of 2010. The rules require manufacturers who file specific reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain ‘Conflict minerals’ that are “necessary to the functionality of production” of those products.

The definition of ‘conflict minerals’ refers to gold, tin, titanium, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold. The U.S. Secretary of State may designate other minerals in the future. We support these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in the surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals.”

Although reporting requirements only apply to publicly traded companies that report to the SEC, these requirements are expected to be passed through our entire copper-based industry supply chain.

OUR COMMITMENT:

1. Support the aims and objectives of the U.S. legislation on the supply of “conflict minerals.”
2. Do not knowingly procure specified metals that originate from “Conflict Region” facilities that are not certified as “conflict-free”.
3. Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to ensure that specified metals are being sourced only from:
 - Mines and smelters outside the “Conflict Region” or
 - Mines and smelters certified by an independent third party as “conflict-free” if sourced in the “Conflict Region.”

This due diligence includes having our suppliers provide written evidence documenting that raw materials used to produce gold, tin, tantalum, and tungsten, used in the materials to manufacture components and products supplied from DEECO Metals, originate outside the “Conflict Region” or, if they originate from within the “Conflict Region,” that the mines or smelters be certified as “conflict-free” by an independent third party. The aim is to ensure that only “conflict-free” materials and components are used in our products.

If we discover the use of these materials produced in facilities considered to be “non-conflict free” in any material, parts, or components we procure, we will take appropriate actions to transition the product to be “conflict-free.”