



## **Conflict Minerals Policy**

It is the policy of Elgin Fastener Group (the "Company") to comply with the rules issued by the U.S. Securities and Exchange Commission ("SEC") implementing the "conflict minerals" reporting and disclosure requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

### **Scope**

As a responsible participant in the metals supply chain, we take seriously our corporate responsibility to ensure materials used in our products are sourced in an ethical manner in compliance with applicable laws and regulations, including SEC's "conflict minerals" rules. These rules establish reporting and disclosure requirements for certain minerals, defined as cassiterite, columbite-tantalite, gold, wolframite and their derivatives tin, tantalum, and tungsten (the "Minerals"), which are sourced from the Democratic Republic of Congo and adjoining countries ("DRC"). Our intention is to comply with these rules which require the Company, as a manufacturer, to file certain reports with the SEC to disclose whether the products we manufacture or contract to manufacture contain the Minerals that are "necessary to the functionality or production" of those products.

### **Supplier Requirements**

The Company's suppliers will be required to declare that all products supplied either:

1. Do not contain tantalum, tin, tungsten or gold that are necessary to their production or functionality; or,
2. If they do contain these minerals, that they originate from non-DRC conflict areas or from smelters that have been validated by an independent private sector party to be "conflict free"

The Company will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. The Company reserves the right to request additional documentation from its suppliers regarding the source of any Minerals included in its products. In addition, suppliers must maintain and provide to the Company, upon request, traceability data for a minimum of five years. Suppliers who do not comply with these disclosure requirements shall be reviewed by the Company's supply chain organization regarding future business.