

Policy on Conflict Minerals

Background

In 2012, the U.S. Securities and Exchange Commission (SEC) adopted rules mandated by the conflict minerals disclosure provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. These rules require publicly-traded companies to report annually on the source and chain of custody of conflict minerals in products manufactured by the company.

MagTek Conflict Minerals Policy

MagTek is committed to the responsible sourcing of conflict minerals throughout our supply chain and working with our global supply chain to ensure compliance with the SEC's conflict minerals rule. We have established a conflict minerals compliance program that is designed to follow the framework established by the Organization for Economic Cooperation and Development (OECD). Our enterprise is fully engaged in implementing that program.

Our supplier contracts will include conflict mineral due diligence and reporting requirements. Any direct sourcing by MagTek of tin, tungsten, tantalum and gold will only be from conflict-free sources, as defined in the SEC's conflict minerals rule. When we become aware of instances where minerals in our supply chain potentially finance armed groups as defined in the SEC's conflict minerals rule, we will work with our suppliers to find alternate conflict-free sources.

We are committed to promoting economic development in Africa through responsible commercial engagement, driving employee awareness, as well as through our corporate citizenship activities.