

A handwritten signature in black ink, appearing to read "John J. Egan".

SUBJECT/TITLE

Conflict Minerals Policy

1.0 PURPOSE/SCOPE

In 2010, Congress enacted the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") to address the exploitation and trade of certain minerals which contribute to violence and human rights abuses in the Democratic Republic of the Congo (the "DRC") and its neighboring countries. As required by Congress, in 2012 the U.S. Securities and Exchange Commission adopted rules implementing the conflict minerals provisions of the Dodd-Frank Act (the "Conflict Minerals Rules"). These rules require public companies to disclose information about whether the products they manufacture or contract to manufacture contain conflict minerals that originated in any covered countries if the conflict minerals are necessary to the functionality or production of those products. If a company's products do contain conflict minerals, then information about the source and chain of custody of those conflict minerals must be disclosed annually. The "Conflict Minerals" for the purposes of the Conflict Minerals Rules are gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), and the U.S. Secretary of State may designate other minerals in the future. The "Covered Countries" for the purposes of the Conflict Minerals Rules are the DRC, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. We support efforts to further the humanitarian goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region.

2.0 POLICY

Our policy is to source materials for our products responsibly, including the sourcing of Conflict Minerals, and we expect that our suppliers are likewise committed to responsible sourcing. We also support greater transparency with regard to the supply chain, in particular the sourcing of Conflict Minerals. Accordingly, we have adopted this Conflict Minerals Policy, and we expect that our suppliers will adopt a similar policy and meet our expectations set forth below.

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3.0 DETAILS OF POLICY

3.1 Our Commitment

We are committed to sourcing products from suppliers that share our values with regard to human rights, ethics, and social and environmental responsibility. Our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting and refining of Conflict Minerals. As a result, we expect that all of our suppliers will partner with us to (i) provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the Conflict Minerals Rules, and (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a manner that results in products and materials that do not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries. We are committed to working with our suppliers to educate them about these issues and the steps that they can take to increase the transparency of the supply chain and to ensure that products and materials in the supply chain do not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries.

3.2 Supplier Expectations

We have the following expectations of our suppliers:

- Where possible, source Conflict Minerals only from sources that have traceable supply chains and from smelters and refiners that have been validated by a recognized, independent third party;
- Implement and communicate to their personnel and suppliers policies that are consistent with this Conflict Minerals Policy, and require that their direct and indirect suppliers do the same;
- Adopt procedures to facilitate the traceability of Conflict Minerals at least to the smelter or refiner level, working with direct and indirect suppliers as applicable, to provide transparency as to the source of any Conflict Minerals;
- Provide us with timely and accurate information, including completing a conflict minerals questionnaire and providing written certifications upon request, regarding the source of Conflict Minerals in our supply chain and the steps that have been undertaken to determine whether such products and materials have benefitted the armed conflict in the Covered Countries;
- Maintain reviewable business records supporting the source of Conflict Minerals for at least five years; and



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- Advise us as promptly as possible of any determination that any products or materials in the supply chain have not been sourced responsibly.

Suppliers are also encouraged to support industry efforts to enhance the traceability and responsible sourcing of Conflict Minerals.

We evaluate our relationship with our suppliers on an ongoing basis, and we reserve the right to evaluate the extent to which a supplier's efforts to comply with this Conflict Minerals Policy have been insufficient or the supplier has failed to cooperate in developing and implementing reasonable steps to comply. If we determine that a supplier's efforts are insufficient, we reserve the right to evaluate the supplier relationship and to take any appropriate actions necessary up to and including discontinuing our business relationship with the supplier.

Nothing in this Conflict Minerals Policy is intended to in any way grant any additional rights or expectations to any of our suppliers, or in any way modify or otherwise limit our contractual or legal rights.

3.3 Additional Information

Our employees, suppliers and other interested parties may contact us regarding this Conflict Minerals Policy at:

Email: conflictminerals@key.net

Phone: 509-394-3203

Revision History (Describes major policy changes)

Rev 05/02/2016

- Updates terminology for consistency with Conflict Minerals Report