



MacLean-Fogg Company Conflict Minerals Policy

REVISED DATE: January 1, 2019; rev 3

PURPOSE: This policy describes MacLean-Fogg Company's commitment to sourcing materials and components from companies that share our values of respect for human rights and dignity.

SCOPE: This policy applies to all MacLean-Fogg Company operations and its subdivisions.



POLICY:

MacLean-Fogg supports the U.S. legislation and other measures that seek to end the violence and environmental devastation in conflict regions financed by the exploitation of conflict minerals, designated to include tin, tungsten, tantalum, and gold.

U.S. SECURITIES AND EXCHANGE COMMISSION (SEC)

On August 22, 2012, the SEC issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act. The conflict minerals rule requires publicly traded companies to report annually the presence of conflict minerals originating in the Democratic Republic of the Congo or surrounding countries (“conflict region”).

OUR COMMITMENT

MacLean-Fogg Company is dedicated to cooperating with our customers and supply chain partners in implementing conflict minerals compliance programs. It is our goal to ensure that only “conflict-free minerals” are used in the materials and components that we procure. This means undertaking reasonable due diligence whereby we are assured that the subject metals are being sourced only from miners and smelters that are either located outside the conflict region or have been certified by an independent third party as “conflict-free” if sourced within the conflict region. We encourage all of our suppliers to likewise support and carry out such aims.

Appendix

Conflict Minerals Policy Statement

The MacLean-Fogg Company and its subdivisions are committed to sourcing materials and components from companies that share our values of respect for human rights and dignity. We support the U.S. legislation and other measures that seek to end the violence and environmental devastation in conflict regions financed by the exploitation of “conflict minerals,” designed to include tin, tungsten, tantalum, and gold.

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act. The conflict minerals rule requires publicly traded companies to report annually the presence of conflict minerals originating in the Democratic Republic of the Congo or surrounding countries (“conflict region”).

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If there are any questions, please do not hesitate to contact Steve Young at CorporateCompliance@macleanfogg.com.

Sincerely,

