HOLDER's Conflict Minerals Policy

HOLDER supports the humanitarian goals of the Conflict Minerals Rule and recognizes the adverse impact from mining and trade of 3TG by armed groups in the Democratic Republic of the Congo (DRC). HOLDER promises **NOT** buying products and materials containing Conflict Minerals directly from Conflict Mines.

HOLDER also requests our suppliers to:

- 1. Commitment to corporate, social and environmental responsibility
- 2. Ensure that any Conflict Minerals contained in the products and materials supplied to HOLDER do not originate from Conflict Mines
- 3. Make available its due diligence in determining the source of its 3TG (i.e. tantalum, tin, tungsten and gold) upon HOLDER's request.

Remarks:

The term "conflict minerals" is defined as columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.