



ROBERTS MANUFACTURING CO., INC.

An ISO 9001:2015 Certified Supplier

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Purpose: To define policy for Roberts Mfg. Co Inc. (RMCI) metal vendors on the “DRC Conflict Free” requirement

The Dodd-Frank Act Section 1502 concerning Conflict Minerals restricts the mining source of the following minerals:

Gold, Tin, Tantalum, Tungsten, Cobalt, Mica

These minerals cannot be mined from certain geographic regions of Political and/or Human Rights conflict. Currently the region involved is the DRC (Democratic Republic of the Congo). In August of 2012 the Securities and Exchange Commission voted and passed the final ruling of the Act. The Act states these restrictions apply only to those materials that contain these minerals in levels that are "necessary to the functionality or production" of the product. This means these minerals have to be intentional additions designed to affect a certain property in the material.

As a metalworking manufacturer of material produced by another company, RMCI is dependent upon the vendors to certify compliance to the rule. The RMCI policy states as follows:

- 1) RMCI requires our vendors to be “DRC Conflict Free”.
- 2) RMCI requires its material vendors to source from smelters validated as compliant to a CFS protocol using the CFS Compliant Smelter List (this list is found at: <http://www.conflictreesmelter.org/cfshome.htm>).
- 3) RMCI implements due diligence measures for conflict free sourcing by annually verifying its vendors adhere to the policy of “Conflict Free” sourcing (paperwork verification only).
- 4) If a vendor does not comply with “Conflict Free” sourcing requirements, RMCI will implement a 90 day probation period in which time for the vendor must become compliant with this policy. Should they not be compliant after 90 days the vendor will no long be used by RMCI.