



4 Ash St. Extension
Derry, NH 03038

Conflict Minerals Policy

We support the end to human rights violation in the mining of certain metals from a location described as the “Conflict Region” in the Democratic Republic of the Congo, DRC. The Securities and Exchange Commission, SEC, adopted the rules to reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Franks Wall Street Reform and Consumer Protection Act of 2010.

The definition of “conflict minerals” refers to gold, tin, tantalum and tungsten regardless of where they are sourced, processed or sold.

Our Commitment:

- Support the aims and objectives of the US legislation on the supply of “conflict minerals”.
- Do not knowingly procure products made with specific minerals that originate from facilities in the “Conflict Region” or are not certified “conflict free”.
- Ensure compliance with these requirements by asking our suppliers to perform reasonable due diligence with their supply chain to assure that specified minerals are being sourced from mines and smelters outside the conflict region or have been certified by an independent 3rd party as “conflict free”.

This due diligence includes having our suppliers provide written documentation that the raw materials used to produce products containing gold, tin, tantalum and tungsten do not originate in the “conflict region” or if they originate in the “conflict region” they are certified as “conflict free” by an independent 3rd party.

If we discover products do contain minerals produced in the conflict region we will take appropriate measures to transition product to “conflict free” mineral producers.

Sincerely,
Richard Shevelow
President