



Weldmac Mfg Company Conflict Minerals Policy
Approved 03/10/2016

Purpose

The United Nations Group of Experts on the Democratic Republic of Congo (DRC) found that the trade of certain minerals, called "Conflict Minerals", is helping finance extreme levels of human rights abuses and violence. "Conflict Minerals" are defined as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin, tantalum, and tungsten.

The U.S. Securities and Exchange Commission released final rules in August 2012, relating to Section 1502(b) of the Dodd-Frank Wall Street Reform and Consumer Protection Act. These final rules require all publicly traded companies to disclose and report annually if the minerals they use in their products or products they contract to manufacture (tin, tantalum, tungsten, or gold, "3T&G") originated from the DRC and/or one of the other "covered countries". The "covered countries" are defined as: (1) Angola, (2) Burundi, (3) Central African Republic, (4) the Republic of Congo, (5) Rwanda, (6) South Sudan, (7) Tanzania, (8) Uganda, and (9) Zambia.

Weldmac's Conflict Minerals Policy reflects our commitment to corporate social responsibility as well as customer "flow-down" requirements to ensure Weldmac does not directly or indirectly engage with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing human rights or related abuses.

Application

This policy applies to Weldmac and all suppliers who provide materials that contain tin, tantalum, tungsten, or gold (Conflict Minerals - 3T&G) whether specifically required by the Dodd-Frank regulation or by necessary "flow-down" requirements of our customers to obtain reasonable assurances of origin and mining conditions in order to maintain overall compliance.

Policy Statement

Weldmac takes its obligations seriously and has adopted this policy as part of our efforts to encourage our suppliers to respect human rights and not contribute to conflict. Weldmac will not tolerate nor by any means profit from, contribute to, assist with, or facilitate the payment by any party to any human rights or related abuses.

Weldmac does not directly source conflict minerals from mines, smelters or refiners, and is in most cases several levels removed from these market participants. Weldmac therefore requires the cooperation of its suppliers in the implementation of this policy, enabling Weldmac to maintain compliance with its customers.

Supplier Requirements

Suppliers who supply or manufacture components, parts or products containing 3T&G, to Weldmac are expected to directly or indirectly source minerals that do not contribute to or finance directly or indirectly violence or human rights abuses in the DRC and/or "covered countries".

In furtherance of this policy, suppliers are expected to:



- Implement and communicate to their personnel and suppliers policies that are consistent with this policy, and require their direct supplier to do the same;
- Put in place procedures for traceability of conflict minerals at least to the smelter or refiner level, working with their direct and indirect suppliers, as applicable;
- Where possible, source conflict minerals from smelters or refiners validated as being conflict free, and require their direct and indirect suppliers to do the same;
- Maintain reviewable business records supporting the source of conflict minerals;
- On an annual basis, at Weldmac's request, provide to Weldmac written certifications and other information concerning the origin of conflict minerals included in products and components supplied to Weldmac, and require their direct or indirect suppliers to do the same; and
- Require their direct and indirect suppliers to establish policies, due diligence efforts and management systems that are consistent with this policy.

Weldmac reserves the right to request from any supplier at any given time such information, certifications and documentation as it deems necessary to monitor or assess compliance with this policy.

Continual violation of this policy, and/or refusal to address issues of concerns, may lead to termination of Weldmac's business relationship with the supplier. This policy will be reviewed and updated as needed.