



STEEL CRAFT CORP OF HARTFORD

“Conflict Minerals” POLICY STATEMENT

The Democratic Republic of the Congo (the DRC) and some of its adjoining countries have been consumed by violence and human rights violations for more than a decade. Today, several militant groups control, exploit and profit from the mining of and trade in so-called “conflict minerals” in the region and leverage the proceeds to fund a continuing campaign of brutal violence against innocent civilians, including children.

Conflict minerals — tantalum, tin, tungsten, and gold — are often used in the manufacture of products such as machinery and consumer electronics.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, signed by President Obama in 2010, and related regulations promulgated by the Securities and Exchange Commission (SEC) (collectively, the Conflict Minerals Law) are aimed at addressing the violence and human rights issues caused by the mining of and trade in conflict minerals in the DRC and adjoining countries. The Conflict Minerals Law requires public companies, to conduct supply chain due diligence on the conflict minerals in certain of their products and report annually to the SEC and post on their websites the results of this due diligence. According to the Conflict Minerals Law, conflict minerals that do not directly or indirectly support militant groups in the DRC or adjoining countries are deemed to be “DRC conflict-free”.

Steel Craft Corp. is committed to responsible corporate citizenship and condemns the atrocities perpetuated by militants in the DRC and its adjoining countries. Steel Craft Corp. is also committed to complying fully with the Conflict Minerals Law. As part of this effort, Steel Craft Corp. will continue to:

- identify the sources of any conflict minerals in the products we manufacture or contract to manufacture;
- improve, year-over-year, our ability to track conflict minerals in our supply chain and report on their countries of origin;
- eliminate any conflict minerals that are not DRC conflict-free from the products we manufacture or contract to manufacture; and
- support industry-wide initiatives.

In addition, Steel Craft Corp. expects that its suppliers will:

- not knowingly supply Steel Craft Corp. with products containing conflict minerals that are not DRC conflict-free; and
- support Steel Craft Corp’s efforts to identify the smelters and refiners that process conflict minerals used in our products and the countries and mines of origin of such conflict minerals.

January 3, 2017