

# Conflict Minerals Policy

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Joyce/Dayton Corp., 5-31-18

Under the Dodd-Frank Act of 2010, public companies are required to disclose measures they have taken to identify the source of “conflict minerals” in the products they manufacture or contract to manufacture (the “Conflict Minerals Rule”). These “conflict minerals” are the source of financing for armed conflicts in the Democratic Republic of the Congo (the “DRC”) and adjoining countries. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing Human Rights abuses in the DRC and adjoining countries.

“Conflict minerals” are four specific minerals and their derivatives: columbite-tantalite (the metal ore from which tantalum is extracted), cassiterite (the metal ore from which tin is extracted), wolframite (the metal ore from which tungsten is extracted), and gold.

We are committed to the responsible sourcing of “conflict minerals” throughout our supply chain for products that we manufacture that contain these minerals. To that end, we are putting policies and systems in place to reduce the risk that the minerals used in any of our products originate from conflict mines in the DRC. We are committed to strengthening our efforts to ensure that we refrain from, directly or indirectly, taking or supporting any action that contributes to the financing of armed groups that are committing human rights abuses in the DRC and other covered countries.

We do not typically source conflict minerals directly from mines, smelters or refiners and therefore, in most cases, we are several levels removed from them. As a result, we rely on the cooperation of our suppliers in the implementation of this policy and in enabling us to meet our compliance obligations.