



Conflict Minerals Policy

We at Struthers-Dunn, LLC support the ending of violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future. We support these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals”.

Struthers-Dunn, LLC Policy Statement

While Struthers-Dunn, LLC is not a publically traded company and therefore not subject to the SEC rules, we realize that we are a supplier of relays to companies who may report to the SEC and therefore we are doing our due diligence to ensure that the listed “Conflict Minerals” are not used in manufacturing our relays.

As a manufacturer of electrical/electronic relays, Struthers-Dunn, LLC does not condone the use of any conflict minerals in the products we purchase or supply. Struthers-Dunn, LLC will not knowingly purchase products that contain conflict minerals. Due to the complexity of the routes by which metals, and in particular precious metals, are smelted, recycled and sold, including the common practice of commingling ores and scrap from many different sources, it is our understanding that it is often impossible for any company to obtain full traceability to an exact origin of all materials.

In cases where we buy materials or products that use or contain gold, tin, tantalum or tungsten for use in our own manufacturing, we are working with our suppliers to ensure they share our philosophy and are buying from conflict-free sources. We use thousands of parts in all the different relays we provide. Due to the costs and manpower associated to adhere to the full “SEC’s Conflict Minerals Policy” we are unable to fully comply with every aspect of that policy. Where we can we will exert due diligence to comply with the best of our abilities.

Therefore, unless otherwise stated, we classify our relays as “undetermined” with regard to the use of “Conflict Minerals.”

Supplier Requirements

Our vendors/suppliers are expected to directly and indirectly source conflict minerals only from sources that do not directly or indirectly benefit or finance “armed groups” (as that term is defined in the Conflict Minerals Rule) in the DRC or another covered country.

Suppliers also are encouraged to support industry efforts to enhance traceability, responsible practices and to undertake reasonable due diligence within their supply chain to determine the origin of the conflict minerals. This includes developing policies and management systems preventing the use of conflict minerals or derivative metals sourced from mines that directly or indirectly finance armed groups through mining or mineral trading in the DRC or any adjoining country. Our suppliers must pass these requirements along to their sub-tier suppliers and require them to do the same with lower tiers of suppliers.

If our suppliers and vendors have information that confirms whether the parts or products they supply us are made with, without or undetermined concerning “Conflict Materials”, we request that they inform us as to their status so we can have that information on file. We also request that, if the status of the products changes either way, to let us know as soon as possible.