

Conflict Minerals Policy

Definition

In 2010, the U.S. Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act"). Section 1502 of the Dodd-Frank Act requires the Securities and Exchange Commission ("SEC") to adopt rules requiring public companies to provide certain disclosures relating to conflict minerals used in their products. Conflict Minerals are currently defined by U.S. Law as Tin (Cassiterite), Tantalum (Columbite-Tantalite), Tungsten (Wolframite) and Gold (also known as "3TG") and any derivatives from these minerals. The intent of the Dodd-Frank mandate is to curb violence and human rights abuses in the Democratic Republic of the Congo (the "DRC") and its adjoining countries (collectively, the "DRC Region", currently specified as Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, South, Sudan, Tanzania and Zambia).

Affirmation

Based on our values and principles we support and share the humanitarian goal of ending the violent conflict in the DRC and surrounding countries by shunning to purchase any materials containing Conflict Minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. We are committed to the responsible sourcing of Conflict Minerals throughout our supply chain and to continuing to comply with the underlying SEC rules and regulations regarding Conflict Minerals. We recognize that our direct and indirect customers are mandated to undertake due diligence across their global supply chains. STANNOL does not file reports with the SEC and therefore we have no legislative obligations to comply with these requirements, though **Stein Sohn** continues to work closely with its partners and supports them in fulfilling their reporting demands.

Expectations of Suppliers

We expect from our suppliers to confirm that no metals originate from the identified conflict zones by disclosing the country of origin and the mining location and smelter name of procured minerals and by submitting their Conflict Minerals Policy. We encourage our suppliers to adopt similar policies, due diligence measures and management systems with respect to Conflict Minerals and to drive those efforts throughout their supply chain to ensure that the specified metals are being sourced only from mines and smelters outside the Conflict Region or mines and smelters within the Conflict Region with have been certified by an independent third party as "3TG conflict free".