



# Conflict Minerals Policy

## INTRODUCTION

Proceeds from the mining of certain minerals in the Democratic Republic of Congo (the “DRC”) and countries adjoining it have been linked to violations of human rights through the funding of illegal armed groups. In accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), the United States Securities and Exchange Commission (the “SEC”) requires publicly traded companies to report on the origin of these conflict minerals.

This policy is consistent with the Code of Business Conduct and Ethics which clearly states the strong commitment to ethical business principles by Trimay.

## DEFINITIONS

**Conflict Minerals:** Refers to columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. Tantalum, tin, tungsten and gold are the widely accepted derivative metals to be of interest at present and are the current focus of the EICC-GeSI conflict free smelter certification program.

**DRC Adjoining Countries:** Are countries that share an internationally recognized border with the Democratic Republic of the Congo. The following countries are currently recognized as “adjoining countries”: Angola, Burundi, Central African Republic, Congo Republic (a different nation than DRC), Rwanda, South Sudan, Uganda and Zambia.

**DRC Conflict Free:** As defined in Section 1502 of the Dodd-Frank Act, “a product may be labelled as ‘DRC conflict free’ if the product does not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country.”

**Conflict minerals obtained from recycled or scrap sources:** Conflict minerals obtained from recycled metals are reclaimed end-user or post-consumer products or scrap processed metals created during product manufacturing. Recycled metals include excess, obsolete, defective and scrap metal materials containing refined or processed metals that are appropriate to recycle in the production of tin, tungsten, tantalum or gold. Minerals partially processed, unprocessed or a bi-product from another ore are not included in this definition.

## POLICY

Trimay is committed to conducting its worldwide business operations in a manner that complies with applicable laws and regulations regarding conflict minerals. To comply with these requirements, Trimay is committed to:

- Inform direct suppliers about this Conflict Minerals Policy and its relationship to the company’s Supplier Code of Conduct.
- Work with its direct suppliers and sub-suppliers to understand the chain of custody for conflict minerals at least to the smelter or refiner level.
- Take measures to source parts and components from its direct suppliers and sub-suppliers that are DRC conflict-free. These measures may include adopting, disseminating and incorporating this policy in related purchase orders, contracts and other appropriate agreements with suppliers.
- Encourage direct suppliers to track and improve their performance in sourcing minerals from their suppliers and sub-suppliers that are validated as being DRC conflict-free in accordance with a national or internationally recognized due diligence framework.



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Trimay encourages its suppliers to:

- Assist Trimay in complying with the SEC regulations and any other applicable regulations related to conflict minerals and provide all necessary declarations.
- Undertake reasonable due diligence within their supply chain to determine the chain of custody and origin of the conflict minerals. Due diligence includes developing policies and management systems to use DRC conflict free minerals, including making these requirements apply to their direct suppliers and sub-tier suppliers and requiring them to do the same with lower tiers of suppliers.
- Take measures to purchase parts, components or materials from their direct suppliers and sub-tier suppliers who source minerals for their products from smelters or refiners validated as being DRC conflict free in accordance with a nationally or internationally recognized due diligence framework.
- Comply with information requests on the source and origin of conflict minerals in the parts, components or materials provided to Trimay. Chain of custody data shall be maintained for five years and be provided to Trimay upon request.
- Maintain records that document Trimay's compliance with applicable laws and regulations regarding conflicts minerals, including those related to conflicts minerals due diligence, for a period of no less than five years.

### COMPLIANCE

This policy applies to Trimay's global business operations. Employees whose responsibilities relate to the supply or sourcing of parts, components and materials should be informed and are expected to comply with these requirements and associated legislation or regulation.

### NON-COMPLIANCE

Trimay will work with its suppliers to seek remedies for non-compliance with this policy. These remedies may include suspension or discontinuing engagement with the supplier.

### REPORTING VIOLATIONS

Violations or potential violations of this policy should be reported by employees to your manager or to the Legal Department.

### ADDITIONAL INFORMATION / CONTACTS

Contact the Legal Department for questions or concerns regarding compliance with this policy.