

Conflict Minerals Sourcing Policy

Conflict Minerals are defined by the SEC (Security Exchange Commissions) as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum tin, gold, and tungsten regardless of whether these minerals finance conflict in the Democratic Republic of the Congo (DRC) or adjoining countries. Conflict minerals originating in the DRC or an adjoining country, defined as the "Covered Countries", may sometimes be mined and sold under the control of armed groups. Some of these minerals can make their way into the supply chains of the products used around the world. It is the policy of Lapeer Plating + Plastics to avoid Conflict Minerals that directly or indirectly finance or benefit armed groups in conflict-affected regions.

Lapeer Plating + Plastics expects our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict minerals are DRC conflict free. As part of Lapeer Plating + Plastic's commitment to corporate responsibility and respecting human rights in its operations and in its global supply chain, Lapeer Plating + Plastics will endeavor to only procure raw materials containing Conflict Minerals that do not support conflict.

In support of this sourcing policy, Lapeer Plating + Plastics will:

- 1. Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers.
- 2. Provide and expect our suppliers to cooperate in providing, due diligence information to confirm that any Conflict Minerals in its supply-chain do not support conflict.
- 3. Collaborate with our suppliers and others on industry-wide solutions to enable products that are DRC conflict free.
- 4. Commit to transparency in the implementation of this policy by making available reports on its progress to its customers, relevant stakeholders, and the public (as required).

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