

Conflict Minerals Policy - Dodd-Frank Act Section 1502

October 26, 2020

Stormtech is committed to sourcing materials and products from companies that share our values regarding human rights, ethics, and environmental responsibility.

On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”) was approved by the U.S. Securities and Exchange Commission (“SEC”). Conflict minerals include columbite-tantalite (coltan; i.e., tantalum); cassiterite (i.e., tin); wolframite (i.e., tungsten); gold or their derivatives. These minerals may be found in buttons, zippers, and other fasteners, in metallized yarns, in rivets and eyes, and as a stabilizer in PVC or other rubber/plastic materials. The minerals only appear, at most, in trace amounts in apparel and bag products.

This legislation was enacted to stop rebel groups in the Democratic Republic of the Congo (DRC) and adjoining countries (“Covered Countries”) from illegally using profits from the minerals trade to fund their activities.

Section 1502 is a disclosure provision that requires companies to determine whether their products contain conflict mineral emanating from the Democratic Republic of the Congo (DRC) and nine adjoining countries – Central Africa Republic, South Sudan, Zambia, Angola, The Republic of Congo, Tanzania, Burundi, Rwanda, and, Uganda. These companies are then required to report their findings as such to the Securities and Exchange Commission (SEC) on an annual basis.

Stormtech is committed to avoiding the use of conflict minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. All Stormtech suppliers will be required to declare that all products supplied either:

- Do not contain tantalum, tin, tungsten, or gold that are necessary to their production or functionality; or
- If they do contain these materials, they originate from non-conflict areas or from smelters that have been validated by an independent party to be conflict free.

In the event that Conflict Minerals from the DRC and/or its adjoining countries are used in the manufacturing process, the factory is required to disclose the mineral being used, the component containing the conflict mineral, the source of the component, and country of origin of the mineral.

Stormtech will routinely evaluate its supplier relationships to ensure continued compliance with this policy. We expect our suppliers to pass these expectations on to their suppliers. Stormtech values its suppliers and appreciates their commitment to the goal of using conflict-free minerals.

We, [Factory Name], certify that NONE of the components used in the manufacturing of products for Stormtech contain Conflict Minerals emanating from the DCR and/or one the nine adjoining countries.

STYLES: _____

FACTORY NAME: _____

ADDRESS: _____

CERTIFIED BY:

(Name)	(Signature)
(Title)	(Date)

We, [Factory Name], certify that ONE or MORE of the components used in the manufacturing of products for Stormtech contain Conflict Minerals emanating from the DCR and/or one of the nine adjoining countries.

Conflict Mineral	Component Containing Conflict Mineral	Conflict Mineral Source	Country of Origin of the Conflict Mineral

STYLES: _____

FACTORY NAME: _____

ADDRESS: _____