

Conflict Minerals Policy Statement

Overview

As a responsible company, **Automatic Spring Products Corporation** supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region.

This Policy shows **Automatic Spring Products Corporation's** commitment and its product regarding actions to address Conflict Minerals.

Our Commitment

1. Support the aims and objectives of the Dodd-Frank Act concerning Conflict Minerals sourcing by working to educate the manufacturers of the products we distribute about Conflict Minerals.
2. Help our suppliers understand the due diligence steps they can take to investigate the source of any Conflict Minerals in the products they sell to **Automatic Spring Products Corporation**.
3. Not continue to source from a supplier any product that contains Conflict Minerals if **Automatic Spring Products Corporation** determines the product is not DRC Conflict Free and the supplier fails to transition to DRC Conflict Free sources.

Commitment to Responsible Sourcing

Automatic Spring Products Corporation supports the humanitarian goals of the Dodd-Frank Act and encourages the manufacturers of the products distributed by **Automatic Spring Products Corporation** to adopt that same policy for their businesses.

The supply chain for Conflict Minerals is complex and lacks an established structure for product manufacturers to trace minerals in the finished goods distributed by **Automatic Spring Products Corporation** back to their source.

Automatic Spring Products Corporation is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of minerals contained in the products they manufacture and sell to **Automatic Spring Products Corporation**.

Supplier Code

Automatic Spring Products Corporation has the following expectations of its suppliers:

- Suppliers should not include in any products sold to **Automatic Spring Products Corporation** any Conflict Minerals that are not DRC Conflict Free;
- Suppliers should develop Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflicts Minerals that are not DRC Conflict Free from being included in the products sold to **Automatic Spring Products Corporation**; and
- **Automatic Spring Products Corporation** suppliers are expected to source Conflict Minerals only from sources that are DRC Conflict Free.

In doing so, suppliers will be expected to:

- Implement and communicate to their personnel and suppliers policies that are consistent with Policy, and require their direct and indirect suppliers to do the same;
- Put in place procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable;
- Use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free, and require their direct and indirect suppliers to do the same;
- Advise **Automatic Spring Products Corporation** of any determination that the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to **Automatic Spring Products Corporation** are not DRC Conflict Free;
- Maintain reviewable business records supporting the source of Conflict minerals ; and
- From time to time, at **Automatic Spring Products Corporation's** request, provide **Automatic Spring Products Corporation** with information concerning the origin of Conflict Minerals included in products sold to **Automatic Spring Products Corporation**, which **Automatic Spring Products Corporation** shall be entitled to use or disclose in satisfying any legal or regulatory requirements or in any customer or marketing communications, notwithstanding the terms of any confidentially agreements that do not specially reference this paragraph.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in Conflict Minerals supply chain.

Consequences of Supplier Non-Compliance

Automatic Spring Products Corporation evaluates its relationships with its suppliers on an ongoing basis.

Automatic Spring Products Corporation reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Automatic Spring Products Corporation reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any products sold by **Automatic Spring Products Corporation**.

Supplier who do not reasonably comply with its Policy shall be reviewed by **Automatic Spring Products Corporation's** supply chain organization for future business.

In the event **Automatic Spring Products Corporation** determines that a supplier's efforts to comply with its Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, **Automatic Spring Products Corporation** reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Nothing in this Policy is intended to in any way grant any additional rights or expectations to a **Automatic Spring Products Corporation** supplier or in any way modify or otherwise limit in any way of **Automatic Spring Products Corporation's** contractual or legal rights.

Conclusion

Automatic Spring Products Corporation fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a DRC Conflict Free supply chain. We encourage all suppliers to likewise support these efforts.