



Marley
Engineered Products

Conflict Minerals

Background

Pursuant to rules adopted by the U.S. Securities and Exchange Commission (“SEC”), as required by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Marley Engineered Products LLC (“MEP”) through its parent company is required to disclose the extent to which products it manufactures or contracts to manufacture contain cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold that are (i) necessary to the functionality or production of those products and (ii) sourced from mines in the Democratic Republic of the Congo or adjoining countries (“Conflict Minerals”).

Commitment

To aid in complying with the SEC disclosure requirements, MEP is working with its suppliers to perform due diligence in determining the potential for Conflict Minerals in its supply chain and products. MEP and its parent company are designing their due diligence processes in accordance with the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (available here: <http://www.oecd.org/dataoecd/62/30/46740847.pdf>).

Expectations of Suppliers

If a supplier cannot determine whether its materials or products contain Conflict Minerals within a reasonable period of time, or is unwilling to support MEP in its Conflict Minerals program efforts, MEP may execute remediation steps up to and including alternative sourcing arrangements. MEP expects to work with its suppliers to help ensure their compliance with the Conflict Minerals rules.

MEP expects each of its suppliers that supplies products that may contain Conflict Minerals to to:

- Establish a Conflict Minerals policy in accordance with applicable SEC rules, implement management systems to support compliance with its policy, and require its suppliers of any tier to take similar steps.
- Identify, in the manner and form specified by MEP, materials or products it sells to MEP, and the smelter that provided the original Conflict Minerals. MEP’s direct suppliers may have to require successive downstream suppliers to provide information contained in MEP’s Conflict Minerals survey until the smelter is identified.
- Provide reports to support the SEC reporting requirements of MEP and its parent company.
- Upon request, permit auditing of its Conflict Minerals policies and procedures.

