



Dura Standard Operating Procedure

Title: Conflict Minerals Policy

Department Code: QA

QMS Document #: 1020

Date of Issue: 03/12/12

Revision Date: 10/24/2013

Dura Magnetics, Inc. Conflict Minerals Policy

In July 2010, the United States passed HR4173, the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"). HR4173 contained section 1502(b) which required all US companies and their suppliers to disclose the chain of custody usage of "Conflict Minerals."

Conflict Minerals refers to the minerals or other derivatives mined in the eastern provinces of the Democratic Republic of the Congo ("DRC") and in the adjoining countries ("Identified Conflict Regions") where revenues may directly or indirectly finance or empower armed groups engaged in civil war or unrest resulting in serious social, environmental, and human abuses.

"Conflict Minerals" include: columbite-tantalite (coltan) (i.e., **tantalum**), cassiterite (i.e., **tin**), **gold**, wolframite (i.e., **tungsten**) or their derivatives and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State.

Dura Magnetics, Inc. fully supports the intent and objectives of Section 1502(b) of the Act, which aims to prevent the use of identified Conflict Minerals that directly or indirectly finance or benefit armed groups in The DRC or adjoining countries (as defined in the Act).

Dura Magnetics Inc. also intends to adopt the Electronic Industry Citizenship Coalition (EICC) Due Diligence reporting process and obtain chain of custody declarations from suppliers, identified as using Conflict Minerals in their products, to ensure transparency and corporate social responsibility throughout the supply chain.

Dura Magnetics is committed to avoiding the use of Conflict Minerals and products which contain conflict Minerals whose provenance is unsubstantiated or are shown to originate from the Identified Conflict Regions. (Conflict mineral provenance must be traceable back to an EICC approved smelter, mineral source, or mineral provider.)



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Suppliers will be required to:

1. Declare that their products supplied to Dura Magnetics, Inc. do not contain tantalum, tin, tungsten or gold that is/are necessary to their production or functionality. (This documented declaration will be made by completing a Dura Magnetics, Inc.'s' Supplier Declaration of Conflict Minerals Due Diligence Reporting Form.)

or:

2. If they do contain these minerals that they originated from non-conflict areas or from smelters that have been validated by an independent private sector party to be conflict free and documented in a reporting template in accordance with the EICC.

and:

3. Dura Magnetics, Inc.'s suppliers are also responsible for adhering to Section 1502(b) of the Act and passing the same requirements on to their suppliers.

Dura Magnetics, Inc. will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. Dura Magnetics, Inc. reserves the right to request additional documentation from its suppliers regarding the source of any Conflict Minerals included in its materials and/or products.

Additionally, suppliers must maintain and provide to Dura Magnetics, Inc. upon request traceability data for a minimum of five years. Suppliers who do not comply with these requirements shall be reviewed by Dura Magnetics Inc.'s supply chain organization for future business.