



# SPENCER PRODUCTS COMPANY

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## SPENCER PRODUCTS CONFLICT MINERAL POLICY

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Spencer Products Policy:

Spencer Products supports the objectives of the Dodd-Frank Wall Street Reform and Consumer Production Act of 2010 on the supply of Conflict Minerals.

We do not knowingly procure any tin, tantalum, tungsten or gold that originates from the Conflict Region. To ensure compliance with the Dodd-Frank Act, we have asked our suppliers to undertake reasonable due diligence with their supply chains to determine whether the specified metals are being sourced from:

- 1) Mines and smelters out the Conflict Region or
- 2) Mines and selters which have been certified by an independent third party as “Conflict Free” of sourced in the Conflict Region.

This due diligence includes having our suppliers provide written documentation as to whether products containing the raw materials tin, tantalum, tungsten and gold used in the manufacturer of the products we buy, originate from outside the Conflict Region or if they originate from the Conflict Region, that the mines or smelters are certified as “conflict free” by an independent third party.

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