

All-West Components & Fasteners Inc.

Conflict Minerals Policy Statement

All-West Components & Fasteners is aware of the mining activities that fuel conflict in the Democratic Republic of Congo, and adjoining countries, and which are responsible for widespread human rights violations. Revenue from the mining and transport of these “conflict minerals” is believed to be financing the groups that are responsible. All-West supports industry-wide efforts to identify, reduce and hopefully eliminate the use of “conflict minerals” in the supply chain (specifically: tantalum, tin, gold and tungsten).

In August 2012, the U.S. Securities and Exchange Commission adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain these “conflict minerals” and to disclose measures taken to eliminate them from their supply chain. All-West is committed to complying with the requirements and has implemented a due-diligence process to meet our obligations under the legislation.

All-West is not a smelter, fabricator or a miner of minerals or materials but strives to work with only suppliers who share our values around human rights, ethics and environmental responsibility. All-West is engaged in an effort to gather information concerning the country of origin of potential conflict minerals in the supply chain. All-West expects suppliers to establish diligence frameworks and management systems to comply with our commitment and All-West reserves the right to take action if a supplier fails to implement reasonable steps to comply. However, at this time, many manufacturers cannot provide detailed information as to the ultimate source of the materials used in products we supply due to complex and fragmented supply chains.

All-West is committed to complying with this legislation as its intention of reducing human rights violations is an important one. We are taking steps to engage our suppliers about this issue and to ensure compliance with this policy.

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