

Conflict Minerals Policy Statement

Support:

Harold Beck and Sons, Incorporated (Beck), is opposed to the human rights violations and violence associated with the mining of certain minerals in the Democratic Republic of the Congo (DRC) and surrounding countries; therefore, Beck fully supports the “Conflict-Minerals Rule” (the “Rule”) as directed in section 1502 of the Dodd-Frank “Wall Street Reform and Consumer-Protection Act of 2010”. Beck also supports the legislative objective of a conflict-free supply chain by making every reasonable effort to insure that any conflict-mineral metals present in its products are procured from legitimate sources by its suppliers.

The definition of “conflict minerals” refers to gold, tantalum, tin, and tungsten (known as 3TG) as well as any derivatives of columbite-tantalite (also known as coltan the ore from which tantalum is extracted), cassiterite (the ore from which tin is extracted); and wolframite (the ore from which tungsten is extracted). The U.S. Secretary of State could add additional minerals in the future if these minerals are determined to be financing conflict in the DRC region. In 2012, the SEC adopted a final rule under the Securities Exchange Act of 1934, Rule 13(p)-1, requiring SEC-reporting (publicly listed) companies to disclose the use of any such “conflict minerals” “necessary to the functionality or production” of its products. Although Beck is exempt from reporting to the SEC because it is privately held, it does have a moral, ethical and commercial responsibility to ensure a conflict-free supply chain.

Beck’s Commitment:

In support of the Rule and a conflict-free supply chain objective, Beck makes the following commitments:

- To not knowingly procure specified metals from any operation located in the “Conflict Region” that are not certified “conflict free”.
- To request that suppliers conduct reasonable due diligence within their supply chains to ensure compliance with the spirit and intent of the Rule.
- To request that certain suppliers provide written confirmation that their products are manufactured utilizing “conflict free” minerals, or, if conflict minerals are sourced within the “Conflict Region”, that those minerals are independently certified as being “conflict free”.

We at Beck will continue to support the objectives and intent of the Rule and associated legislation to ensure, with reasonable due diligence, that the materials utilized in the manufacture of our products remain conflict-free.