

Conflict Minerals Policy

Hayes Manufacturing is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Hayes Manufacturing seeks to source products, components and materials from companies that share our values around human rights, ethics and environmental responsibility.

In August 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain “conflict minerals” originating from the Democratic Republic of the Congo (the “DRC”) or adjoining countries. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations. “Conflict minerals” refers to columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location or origin of the minerals or derivative metals.

Hayes Manufacturing supports industry-wide efforts to identify, reduce and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations. Hayes Manufacturing is committed to complying with any applicable requirements under the Conflict Minerals Rule and has implemented a due-diligence process to meet its obligations under the legislation.

Suppliers to Hayes Manufacturing are expected to establish their own conflict minerals policies, due diligence frameworks and management systems that are designed to prevent conflict minerals originating from the DRC or an adjoining country, to the extent that they benefit groups committing human rights violations, from being included in the products sold to Hayes Manufacturing. In the event Hayes Manufacturing determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, Hayes Manufacturing reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.