Conflict Minerals Policy Statement

Conflict minerals include Columbite-tantalite (coltan), cassiterite, wolframite and gold, or their derivatives, including tantalum, tin, and tungsten, originating from the Democratic Republic of the Congo (DRC) and adjoining countries sometimes directly or indirectly benefit or fund armed groups that are perpetrators of serious human rights abuse. Some of these minerals and/or derivatives can make their way into the supply chains of the products used around the world. It is the policy of Klein Products to avoid conflict minerals that may directly or indirectly finance or benefit armed groups from conflict-affected regions.

As part of Klein Products’ commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is Klein Products’ goal to seek to only procure raw materials containing minerals that do not support conflict. Klein Products is not allowed to purchase raw metal ores that may be used in our products from smelters or mines. We are several supply chain layers removed from the mining and processing of these metals, and as a result we do not have firsthand knowledge of their sources. Klein Products will endeavor in good faith to have its suppliers exercise due diligence to evaluate their respective supply chains.

In support of this sourcing policy, Klein Products will provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the conflict minerals in our supply chain do not support conflict. Furthermore, Klein Products will work to discontinue engagement with suppliers who pose a reasonable risk to be supporting conflict.