

## AMERICAN DISTRIBUTORS INC. CONFLICT MINERALS POLICY STATEMENT

There is an increasing awareness of violence and human rights violations in the mining of certain minerals from an area described as the "Conflict Region," located in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. As a result, the Dodd-Frank **Wall Street Reform and Consumer Protection Act of 2010** directed the U.S. Securities and Exchange Commission ("SEC") to adopt rules to implement disclosure requirements related to these "conflict minerals." These rules apply to manufacturers who file periodic reports with the SEC and who manufacture or contract to manufacture products containing "conflict minerals" that are "necessary to the functionality or production" of those products. These manufacturers are required to make inquiries as to the origin of these "conflict minerals" and file a report with the SEC to describe and disclose the results of their inquiries.

"Conflict minerals" refers to **tin, tantalum, tungsten, and gold**, which are derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The intent of these requirements in the Dodd-Frank Act is to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of conflict minerals.

### **American Distributors Inc.'s Policy:**

American Distributors Inc. supports the aims and objectives of the US legislation on the supply of Conflict Minerals.

We do not knowingly procure any tin, tantalum, tungsten or gold that originates from the Conflict Region unless they originate from mines or smelters that are certified as "conflict free." To ensure compliance with the Dodd-Frank Act, we are asking our suppliers to undertake reasonable due diligence with their supply chains to determine whether they specified metals are being sourced from:

1. Miners and smelters outside the Conflict Region **or**
2. Miners and smelters which have been certified by an independent third party as "conflict free" if sourced within the Conflict Region.

This due diligence included having our suppliers provide written documentation as to whether products containing the raw materials tin, tantalum, tungsten, and gold used in the manufacture of our products, originate from outside the Conflict Region or if they originate from within the Conflict Region, that the mines **or** smelters be certified as "conflict free" by an independent third party.

If we discover that tin, tantalum, tungsten or gold procured by us is produced in the Conflict Region from facilities that are not certified "conflict free" facilities, we will use our best efforts to transition the product to be conflict free.



David Beck

President and Chief Executive Officer