

Conflict Free Minerals Policy Statement

SPI Supplies is aware that the mining and trading of conflict minerals in the Democratic Republic of Congo (DRC) and adjoining countries are fueling some of the world's worst human rights violations as well as causing extreme environmental degradation in these areas. Revenues generated from the mining and trading of these conflict minerals are used to fund these social and environmental abuses. These minerals and their refined metals are -tantalum, tin, tungsten and gold (3TG). The most commonly mined conflict minerals are cassiterite (for tin), wolframite (for tungsten), coltan (for tantalite) and gold ore, which are extracted from the DRC and/or adjoining countries.

In July 2010, The United States passed the Dodd-Frank Financial Reform and Consumer Protection Act (Dodd-Frank). On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) under Section 1502 of this bill, approved the final rule that all U.S. stock listed companies and their suppliers are required to disclose the usage of Conflict Minerals (3TG). SPI Supplies fully supports the actions of governments and organizations in efforts to increase supply-chain transparency and enable companies to obtain conflict-free minerals from environmentally and socially responsible sources.

SPI Supplies is a privately owned company and a small business entity and therefore is not required by Dodd-Frank to file this information with the SEC. However, SPI Supplies has a process in place to obtain information from its current suppliers as to the origins of 3TG metals used in the manufacturing of SPI Supplies products. Since SPI Supplies is several steps removed from the procurement of raw materials, we rely on information provided to us by our suppliers regarding the source of their metals. We expect all of our suppliers to provide SPI Supplies with 3TG metals sourced from conflict-free areas and where applicable, to be in full compliance with the Dodd-Frank regulations and to provide all necessary declarations. These regulations must also be meet by any companies within the overall supply chain of our suppliers.

Based on information provided to us by our suppliers, SPI Supplies has not and will not knowingly supply its customers with products containing conflict minerals from the DRC and adjoining countries. SPI Supplies will continue to survey our suppliers to insure they are in full compliance with this policy.

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