



Conflict Minerals Policy

The policy of Exacto Spring Corp. is to completely exclude all Conflict Minerals and Metals from its supply chain.

Conflict Minerals and Metals are materials, which through their mining, production or supply have either knowingly or inadvertently been of benefit to illegal armed groups. All such materials are excluded from Exacto Springs supply chain and are conflict free.

Exacto Spring's policy in order to achieve conflict free status in the management of its supply chain is as follows:

1. The policy is to purchase materials only from reputable suppliers with whom long relationships have been established or on whom adequate due diligence in terms of know your supplier protocols can be carried out.
2. In all cases due diligence will be conducted on the supplier and supply chain to ensure that the supply is genuine, legitimate and does not in any way contribute to conflict or human rights abuses.
3. Due diligence will include written certification and assurance from each supplier confirming that there are no Conflict Metals and Minerals in their own supply chain.
4. The due diligence is ongoing and the origin of the materials will continue to be checked and verified.
5. Exacto complies at all times with both national and international law relating to Conflict Minerals, including UN Security Council Resolutions and the US Dodd Frank Act.
6. Exacto's policy is to differentiate itself by offering its customers conflict free products, so that the final customer in the supply chain can be confident its products are produced from metals which are conflict free.
7. If we discover the use of these minerals produced in facilities that are considered to be "non-conflict free", in any material, parts or components we procure, we will take appropriate actions to transition product to be "conflict free".