



## Conflict Minerals Policy

### **Dodd-Frank Act**

In 2010, Congress enacted the Conflict Minerals provisions of the Dodd-Frank Street Reform and Consumer Protection Act with the goals of eliminating the illegal trade in gold, tin, tantalum and tungsten (Conflict Minerals) and cutting the funding of armed groups in the Democratic Republic of the Congo (DRC) and its neighboring countries (Angola, Burundi, Central African Republic, The Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia) that are engaged in human rights abuses.

Section 1502 of the Dodd-Frank Act requires public traded companies to report to the U.S. Securities and Exchange Commission (SEC) and disclose on their website whether any of the Conflict Minerals in the products they manufacture or contract to manufacture originate in the DRC Region and the due diligence conducted to determine if the original sale of the mineral funded armed conflict. The SEC issued implementing regulations and guidance on August 22, 2012.

B&B Specialties, Inc. is not subject to the Dodd-Frank Act, however, in support of our customers' due diligence efforts, our company has voluntarily adopted a conflict minerals policy and has ascertained that all products sold by B&B Specialties, Inc. and its GS Aerospace Division to our customers are "DRC Conflict Free."

### **B&B Specialties, Inc. and GS Aerospace - Commitment to Responsible Sourcing**

B&B Specialties, Inc. and its GS Aerospace Division has built a legacy of operating and sourcing in an ethically and socially responsible manner. B&B Specialties, Inc. and its GS Aerospace Division are committed to sourcing products from companies that share our values around human rights, ethics, and social and environmental responsibility.

B&B Specialties, Inc. and its GS Aerospace Division fully support the humanitarian goals of the Dodd Frank Act – eliminating illegal mineral trading and the funding of armed conflict while supporting legitimate commercial ventures. B&B Specialties, Inc. and its GS Aerospace Division purchase raw materials from manufacturers who have certified that their products are "DRC Conflict Free", and we do not directly purchase any Conflict Minerals from any source. Since the supply chain for Conflict Minerals is complex, we are committed to working with our supply chain to increase transparency regarding the origin and traceability of minerals contained in our products with the goal of ensuring that all products sold by B&B Specialties, Inc. and its GS Aerospace Division to our customers are "DRC Conflict Free."

B&B Specialties, Inc. and its GS Aerospace Division will be carrying out supply chain due diligence consistent with the OECD guidelines. Suppliers of certain products will be required to complete the EICC-GeSI Conflict Minerals Reporting Template.



## Conflict Minerals Policy

### **B&B Specialties, Inc. and its GS Aerospace Division's Expectations of Suppliers**

- Raw material suppliers may not include in any products sold to B&B Specialties, Inc. and its GS Aerospace Division any tin, tantalum, tungsten or gold mined in the DRC or adjoining countries that fund armed conflict.
- Raw material suppliers are required to develop Conflict Minerals policies, due diligence frameworks, and management systems, consistent with the Organization for Economic Cooperation and Development (OECD) guidelines and to drive those efforts throughout their supplier chain.
- Raw material suppliers of certain B&B Specialties, Inc. and its GS Aerospace Division products will be required to provide written evidence of due diligence documentation including completion of the EICC-GeSI (Electronic Industry Citizenship Coalition – Global E-Sustainability Initiative) Conflict Minerals Reporting Template.
- To the extent available, Suppliers must use EICC-GeSI designated Conflict-Free Smelters as the source for any of the Conflict Minerals used in the products sold to B&B Specialties, Inc. and its GS Aerospace Division.

### **Additional Information**

Questions regarding B&B Specialties, Inc. and its GS Aerospace Division's Conflict Minerals Policy and Compliance program can be addressed to [sales@bbspecialties.com](mailto:sales@bbspecialties.com).