

National Manufacturing Co. Inc. Policy on Conflict Minerals

National Manufacturing Co. Inc. is concerned about the use of natural resources to fund the armed conflict in the Democratic Republic of the Congo (DRC), or adjoining countries¹. National does not purchase “conflict minerals”² from smelters or mines. There are multiple levels of suppliers between National and the smelters and mines from which minerals are sourced. National requires its suppliers to certify the source(s) of the minerals used in our products to be from smelters who comply with Electronic Industry Citizenship Coalition (EICC) Conflict-Free requirements. National confirms to the best of our knowledge that none of the products we produce contain “conflict minerals” purchased or supplied by the DRC or adjoining countries as required in section 1502 of the Wall Street Reform and Consumer Protection Act.

In July 2010, President Barack Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. This act imposes new regulations regarding “Conflict Minerals”. On August 22, 2012, the Securities and Exchange Commission (SEC), adopted a rule implementing the “conflict minerals” disclosure requirements in Section 1502 of the Dodd-Frank Act, passed by Congress in 2010 (<http://www.sec.gov/rules/final/2012/34-67716.pdf>).

- (1) The term “adjoining country” is defined in Section 1502(e)(1) of the Act as a country that shares an internationally recognized border with the DRC, which presently includes Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.
- (2) The term “conflict mineral” is defined in Section 1502(e)(4) of the Act as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the DRC or an adjoining country.