



a PennEngineering® Company

HEYCO PRODUCTS CORP.

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November 3, 2014

Heyco Conflict Minerals Policy

“Conflict Minerals” refers to minerals or other derivatives mined in the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war, resulting in serious social and environmental abuses. In July 2010, the United States passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502(b) of this law requires all US stock listed companies to disclose the usage of Conflict Minerals (Tin, Tantalum, Tungsten, and Gold . . . 3TG).

Heyco fully supports this legislation and the Electronic Industry Citizenship Coalition (EICC)/Global e-Sustainability Initiative (GeSI) position to assure that specified minerals are not being sourced from mines in the “Conflict Region”, which are controlled by non-government military groups. Heyco has adopted the EICC Due Diligence reporting process and will require declarations from all appropriate suppliers, ensuring transparency in our supply chain.

- Suppliers are expected to have policies and procedures in place to ensure that products and parts supplied to Heyco are ‘DRC Conflict-free’.
- Suppliers are expected to provide all necessary due diligence information to confirm that all 3TG supplied to Heyco is DRC Conflict-free.
- Heyco expects suppliers to pass this requirement on to their supply chain.
- Compliance to these requirements will be taken into consideration when selecting and retaining suppliers.

Patrick Sardoni

A handwritten signature in blue ink, appearing to read "Patrick Sardoni".

Quality Manager
Heyco Products Corp.