

Conflict Minerals Policy

Conflict Minerals are the minerals Tin, Tungsten, Tantalum, Gold and their derivative products whose mining helps to finance ongoing conflicts in many areas of the world.

Of particular concern are minerals from the Democratic Republic of Congo (DRC) and nine surrounding countries. Those nine countries are Republic of Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda and Zambia. Recent federal legislation provides for specific reporting requirements for companies that file with the SEC.

In order to comply with customer requirements, Schaller Corporation has adopted a DRC Conflict Free sourcing policy that requires suppliers of materials containing conflict minerals to procure those minerals used in or necessary to the production of items supplied to Schaller Corporation from sources that do not originate in the DRC or 9 surrounding countries.

All suppliers must review their products shipped to Schaller Corporation and if it contains a conflict mineral, notify Schaller Corporation, and initiate a country of origin inquiry all the way back to the original smelter and document those results. Preferred methodology is through the use of EICC/GeSI CM Reporting Template or enrollment in the iPCMP iPoint Conflict Minerals Platform tool.

Schaller Corporation may require additional information from specific vendors as necessary.

Additional information may be found at the following websites:

Conflict Minerals Final Rule at the SEC website: <http://www.sec.gov/rules/final.shtml>

OECD Due Diligence Guidance: <http://www.oecd.org/dataoecd/62/30/46740847.pdf>

CFS Compliant Smelter List: <http://www.conflictreesmelter.org/>

EICC/GeSI Templates: http://www.eicc.info/tools_and_resources05.shtml

iPCMP website: <http://www.conflict-minerals.com/>

Questions may be addressed to: Sustainability@schallergroup.com