

## **Conflict Minerals Policy**

As a socially responsible company, Tiercon has concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights, comply with laws and regulations, and follow a rigorous Code of Conduct.

Tiercon supports the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC) and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda).

It has been widely reported that the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum and gold, now referred to as “conflict minerals.” Armed groups fight for control of mines in this region and use forced labor to mine and sell the minerals, which in turn funds ongoing violence.

In response to violence and human rights violations in the mining of certain minerals from the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries, the U.S. Securities and Exchange Commission (SEC) has adopted rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

We are committed to taking necessary steps to comply with the rules and have implemented a global process to meet our obligations. We support industry-wide efforts to identify the source of conflict minerals and certify mines and smelters as “conflict free”.

Our direct suppliers are requested to annually comply with our request for a completed Conflict Minerals Reporting Template (CMRT) to report their use of 3TG, the processing smelter or refiner, and the country and mine of origin. Tiercon direct suppliers are expected to request necessary Conflict Minerals information from their own supply chain. If a supplier’s response indicates that its products do not include 3TG, the supplier must certify this information.

This policy is not intended to ban procurement of Conflict Minerals or other products that originate in conflict-affected and high-risk areas, but to promote sourcing from responsible sources within those regions.

In addition to Conflict Mineral disclosure requirements as indicated above there is a heightened demand for transparency into origins of other raw materials used in automotive products. Disclosure regarding additional raw materials may be requested or required in the future. It is our expectations that such information will increasingly become a prerequisite for quotation by the OEM’s. Tiercon expects its suppliers will conduct similar due diligence with respect to additional raw materials as it requires for 3TG.

Additional information on conflict minerals reporting can be found at either of these two links: <http://www.aiag.org> or <http://conflict-minerals.com>