

Conflict Minerals Policy

1. PURPOSE

This policy provides a framework through which Silver State Wire & Cable (SSWC) shall comply with Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act pertaining to Conflict Minerals. It is applicable to all SSWC business and functional units and entities globally.

2. SCOPE

Content

On August 22nd, 2012, the U.S. Securities and Exchange Commission (“SEC”) published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act (“Act”) governing Conflict Minerals. The Act requires companies to perform due diligence on the source and chain of custody of Conflict Minerals contained in their products. SSWC adopts this policy to guide the implementation and maintenance of its Conflict Minerals program.

Application

This policy applies to Silver State Wire & Cable.

3. DECLARATION

- a. SSWC strives to have a Conflict Free supply chain, and is committed to sourcing products and materials from non-conflict sources;
- b. SSWC expects that its suppliers have due diligence processes in place to identify the source of the Conflict Minerals contained in their products, and that those sources do not support conflict and violations of human rights;
- c. To further the benefits of Section 1502 and promote its intended purpose, SSWC will work with suppliers with underdeveloped processes, providing information and guidance in an attempt to increase supply chain transparency throughout the world and into the DRC and surrounding region.

SSWC provides all suppliers with a Country of Origin survey. This survey must be completed by those suppliers to ensure continued eligibility to do business with SSWC. By signing and submitting their survey, suppliers certify that they have procedures in place to demonstrate that materials and products are sourced in accordance with SSWC standards, and attest to the reliability of the survey responses. Based on the survey results, SSWC may require additional information from those same suppliers in order to determine whether or not a supplier’s products or materials are indeed “Conflict Free”.

SSWC is dedicated to working with its suppliers to help establish traceability of Conflict Minerals and assure that our products and materials are responsibly sourced. However, suppliers who are not responsive to SSWC’s requests for information via the vendor survey process may be disqualified from doing business with SSWC. At a minimum, SSWC will look to establish new sources for products and materials where the origin of Conflict Minerals in those products cannot be ascertained.