

Background

Superior supports the ethical sourcing of all materials used in its supply chain, including, to the limited extent such materials are used, gold, tin, tungsten and tantalum (collectively, “**Conflict Minerals**”) which originate from the Democratic Republic of Congo and its adjoining countries. Superior has implemented this Conflict Minerals Policy relating to the sourcing of Conflict Minerals in an effort to help end civil conflict and human rights abuses by armed militant groups that receive funding from trade in Conflict Minerals derived from these covered countries

Policy

Superior performs internal due diligence on an annual basis to determine which of the products it manufactures or contracts to manufacture contain Conflict Minerals, and whether such Conflict Minerals are necessary to the functionality or production of such products. Additionally, Superior performs external due diligence on an annual basis by reaching out to those suppliers who supply it with materials containing Conflict Minerals to gather information regarding where they originate from. In those instances where a supplier is unable to confirm the country where its Conflict Minerals originate from, Superior will request that the supplier perform additional due diligence in order to verify this information.

If a supplier is unwilling or unable to comply with Superior’s informational requests, or is found to have sourced Conflict Minerals from a non-approved smelter located in one of the covered countries, Superior will take appropriate measures as necessary to try and address any such deficiency, including seeking an alternative source of supply that can comply with its requirements.