

Conflict Minerals Sourcing Policy

Turner Bellows, Inc. is committed to responsible sourcing of goods throughout our supply chain. This includes minerals from around the world that may become incorporated into our goods or services.

Turner Bellows, Inc. is aware that certain minerals mostly originate from Conflict Affected and High-Risk Areas (CAHRA), including the Democratic Republic of Congo (DRC) and its adjoining countries. In these countries there is concern that proceeds from minerals could be used to contribute to armed conflicts or human rights abuses. The minerals tin, tungsten, tantalum, and gold (3TG Minerals) that are extracted in certain areas and contribute to armed conflict in DRC and the adjoining countries are referred to as conflict minerals.

Although we do not source minerals directly, the goal of Turner Bellows, Inc. is to avoid sourcing materials with suppliers that may source minerals in a way that could contribute to armed conflicts or human rights abuses. In order to address responsible mineral sourcing, our policy and procedures are based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas ([OECD Guidance](#))

In an effort to avoid conflict minerals we will take the following steps:

1. Practice due diligence with relevant suppliers
2. Ask relevant suppliers to maintain Conflict Mineral Sourcing Policies
3. On an annual basis, request relevant suppliers to complete a Conflict Minerals Reporting Template (CMRT)
4. Extend these requirements to sub-tier suppliers.

If a supplier is found to be in violation of our policy or requirements for responsible sourcing, they will be required to supply acceptable corrective action for the violation. If corrective action from the supplier is not acceptable, we may take further steps including termination of our business relationship.