

November 13, 2014

## Conflict Minerals Policy Statement

As required by the Dodd-Frank Act, the U.S. Securities and Exchange Commission (SEC) has adopted rules requiring publicly traded companies to disclose whether they use conflict minerals that originated in the Democratic Republic of the Congo (DRC) or an adjoining country and if so, to issue a report identifying their products that are not conflict free and their due diligence efforts to determine the country of origin and chain of custody of the metals. Conflict free means the product does not contain conflict minerals that directly or indirectly finances or benefits armed groups in the DRC or an adjoining country.

The definition of "conflict minerals" refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future.

Specialty Screw Corporation is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Specialty Screw Corporation seeks to source products, components and materials from companies that share our values around human rights, ethics and environmental responsibility.

Specialty Screw Corporation requires our suppliers to exercise due diligence to investigate the source of these minerals that includes providing us with completed conflict minerals declarations using the EICC/GeSI Conflict Minerals Reporting Template.

We are working with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. In the future, our suppliers' willingness to comply with this initiative could be a factor in our sourcing decisions.

We will continue to evaluate our policies and collaborate with other companies to share information and approaches that aid with rule compliance.

Russ Johansson  
President  
Specialty Screw Corporation