

Conflict Minerals Policy

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"Conflict Minerals" refers to minerals or other derivatives (specifically, Tin, Tantalum, Tungsten, and Gold) mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In July 2010, the United States passed HR4173, the Dodd-Frank Financial Reform Bill section 1502(b) requiring all US public companies and their suppliers to disclose the chain of custody usage of conflict minerals.

Oldelft is committed to sourcing responsibly and considers mining activities that fuel conflict as unacceptable.

Oldelft's efforts related to conflict minerals are aligned to the work of the Electronic Industry Citizenship Coalition® (EICC®) and Global e-Sustainability Initiative (GeSI). The EICC's and GeSI's work includes the Conflict-Free Smelter Program and the Conflict Minerals Reporting Template ("Template") (see www.responsiblemineralsinitiative.org). The Template provides a common industry approach for the collection of sourcing information related to conflict minerals. The information contained in the Template constitutes a critical part of Oldelft's due diligence program.

In addition:

- Oldelft expects our suppliers to source materials from socially responsible suppliers.
- Oldelft expects all of its suppliers to comply with the Dodd-Frank regulation <http://www.sec.gov/rules/final/2012/34-67716.pdf> and provide all necessary declarations.
- Suppliers must pass this requirement through the supply chain and determine the source of specified minerals.
- Suppliers who are non-compliant to these requirements shall be reviewed by our purchasing managers for future business

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