



GEM MANUFACTURING CO., INC.
78 Brookside Rd. Waterbury, CT 06708 Tel:203/574-1466 Fax:203/754-2944

Conflict Minerals Policy Statement

Gem Manufacturing Co. Inc. strives to maintain the highest standards of ethical conduct and integrity in all areas of its business and takes very seriously the worldwide concerns of violence and human rights violations in the mining of certain minerals (Tantalum, Tungsten, Tin, and Gold) from the Democratic Republic of the Congo and surrounding countries (the "Conflict Region").

Gem is committed to a policy (a) whereby Gem does not knowingly contribute (whether directly or indirectly) to human rights violations in the Conflict Region, and (b) that any Conflict Minerals that may be contained in any of our products are not directly or indirectly benefitting armed groups in the Conflict Region.

In support of this effort, Gem shall strive to:

- Develop and implement a process that is designed to demonstrate that any Conflict Minerals contained in its products are sourced in accordance with this policy;
- Encourage its suppliers to implement policies and procedures toward preventing the use of Conflict minerals sourced from mines controlled by armed groups in the Conflict Region similar to this Policy;
- Require its suppliers to document their efforts to determine the source of any Conflict minerals provided to Gem; and
- Encourage its suppliers to source, if practicable, Conflict minerals from smelters certified through the EICC/GeSI Conflict Free Smelter (CFS) program.

A handwritten signature in black ink that reads "Christopher Gemino".

Name
Christopher Gemino

Position
Director of Quality Assurance

Date
4-29-19