



Conflict Minerals Policy

Moeller Aerospace supports ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. As a result, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products. Moeller is not a publicly traded company and is not directly subject to any SEC requirements.

The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten regardless of where they are sourced, processed, or sold. The U.S. Secretary of State may designate other minerals in the future. We support these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals”.

Moeller Aerospace is a “job shop” manufacturing facility and as such we manufacture products in accordance with drawings, specifications, and designs requirements as determined by our customers and beyond our control. These products are typically made of high temperature alloys. The composition of these alloys is as required by the material specification (generally AS, AMS, or OEM) and is beyond our control. The alloys are originally produced by mills and their raw material sourcing is beyond our control.

However, we can state that at this time our products are typically made from alloys that do not contain substantial quantities of conflict minerals. Additionally:

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1. We support the goal and objectives of the U.S. legislation on the supply of “conflict minerals”.
2. We will not knowingly procure specified metals that originate from facilities in the “Conflict Region” that are not certified as “conflict free”.
3. We will ensure compliance with these requirements and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from mines and smelters outside the “Conflict Region” or mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”.

Last Reviewed: 25-Oct-2021 – Jim Jensen, Quality Engineer

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