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	Conflict Minerals (3TG) Policy 960-10277	
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Reviewed by Quality Assurance Manager Date: 2/24/2014	Approved by General Manager Date: 2/24/2014	

Purpose and Scope

The U.S. Securities and Exchange Commission (SEC) passed the final rules on Conflict Minerals (Gold, Tungsten, Tin and Tantalum) in the supply chain of publicly held companies effective November 13, 2012. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act added Section 13(p) to the Securities and Exchange Act of 1934.

The rules state that any company that reports to the SEC and manufactures or contracts to manufacture products that contain Conflict Minerals necessary for the functionality or the production of their products are required to make public disclosure of the origin of the Conflict Minerals and the company's due diligence in determining the source and chain of custody of those minerals should they originate from the Democratic Republic of The Congo (DRC) or adjoining countries (Angola, Burundi, Central African Republic, Rwanda, Sudan, Tanzania, Uganda and Zambia).

Manufacturers must perform due diligence to determine whether the existence of Conflict Minerals in their products support armed groups within the DRC or adjoining countries. Tripp Enterprises, as a supplier to many companies that report to the SEC, is in the position of having to perform due diligence in regards to supply chain reporting for those customers for whom due diligence reporting is required.

Tripp Enterprises recognizes that the use of these minerals is necessary in the production of some of the manufactured products we purchase to support our manufacturing efforts. Tripp Enterprises is committed to ensuring that any minerals utilized in production processes, which may originate from conflict regions, are DRC conflict free and do not support armed groups within the DRC and surrounding regions. It is Tripp Enterprises' intent to fully comply with the requirements set forth in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Policy Statement

Tripp Enterprises' suppliers and vendors are required to ensure that products sold to Tripp Enterprises, which contain these mineral(s) are DRC conflict free. Tripp Enterprises is implementing this due diligence program to identify and trace the specified minerals in the supply chain based upon available tools and procedures provided by the Electronic Industry Citizenship Coalition (EICC) and the Organization for Economic Cooperation and Development (OECD). Tripp Enterprises requires that suppliers whose products contain the identified minerals submit information to Tripp Enterprises using the standardized EICC / GeSI Conflict Minerals Reporting Template developed for tracing Conflict Minerals through the supply chain. As directed by Tripp Enterprises' customers, Tripp Enterprises requires its suppliers to develop a Conflict Minerals Policy to reasonably assure that the identified minerals used in the production of their products are DRC conflict free. It is expected that Tripp Enterprises suppliers will set forth in their policies their responsibility for establishing a due diligence program to ensure DRC conflict free supply chains and that those efforts will be reported to Tripp Enterprises in the form of written policies and procedures. Tripp Enterprises will archive submitted policies as part of its continuing due diligence program. Tripp Enterprises expects its suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

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Supplier Requirements and Support

Each supplier providing products and services intended for use with, or inclusion in, products manufactured by Tripp Enterprises will be required to complete the EICC / GeSI Conflict Minerals reporting form and submit it to Tripp Enterprises. The report will be completed on a product specific or overall service basis. The basis to be considered when completing the report will be determined by Tripp Enterprises and the specific supplier from whom the report is being requested.

For example, if a gold plating service provider can demonstrate that the materials used for all of its gold plating services can be traced to specific smelters, then product specific reporting will not be necessary. Conversely, if an electronics products supplier determines that electronic components procured for Tripp Enterprises' products may come from various sources depending upon when, and from whom, components are procured, then product specific reporting will be required.

In either case, the same EICC / GeSI reporting template will be utilized. This template is viewable / available at www.conflictreesmelter.org - along with information and training. Upon request for due diligence reporting, Tripp Enterprises will attach a copy of the EICC Conflict Minerals Report Template to its request (email).

The Electronic Industry Citizenship Coalition provides information and its Code of Conduct and an updated list of current members at the following site: www.eicc.org

Whereas it is the intent of Tripp Enterprises to work with all suppliers in achieving compliance with the Conflict Minerals requirements, as is required by Tripp Enterprises' customers, suppliers who are unwilling or unable to meet the due diligence reporting requirements will be reviewed for continued suitability as a supplier.

Tripp Enterprises
24 FEB 2014