



June 2017

Policy on Conflict Minerals

Bodine Electric Company is committed to eliminating conflict minerals from our supply chain and to comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. As a privately held company, we are not subject to the SEC disclosure requirement of the Dodd-Frank Act, however to support our customers and to demonstrate our commitment to adhere to all laws and regulations relating to environmental, occupational safety and health, transportation, labor practices and material content, we have implemented this policy and due diligence reporting activities with our supply chain to ensure that our metals suppliers are DRC conflict-free.

To achieve these goals, Bodine Electric requires its supply chain partners to only use smelters/refiners verified to be compliant with the EICC/GeSi Conflict-Free Smelter Program and to provide Bodine Electric with a completed Conflict Minerals Reporting Template available at www.conflictreesmelter.org.

In addition suppliers of materials that contain tin, tantalum, tungsten or gold are expected to:

- Declare that any material, part, sub-component, component or finished product supplied to Bodine Electric either directly or via a third party does not, to the best of its knowledge, contain any conflict minerals originating from the Democratic Republic of Congo or its adjoining countries as defined in section 1502 of the Dodd – Frank Act and its affiliated laws or regulations.
- Proactively undertake due diligence and continuous monitoring of the supply chain to avoid direct or indirect procurement of Conflict Metals.
- If a Supplier becomes aware of the use of metals that have been derived from Conflict Minerals in any goods supplied to Bodine Electric, it shall immediately notify Bodine Electric. Such notification shall include any tracking information to specify which goods may contain these metals.

The attached EICC/GeSi Conflict-Free Minerals for Bodine Electric Company contains the current reporting status for our company and is updated quarterly to reflect any changes in our supply chain.

Further questions regarding this policy can be directed to info@bodine-electric.com.



An Initiative of the EICC and GeSI

Select Language Preference Here:

- [普通话/你的语言](#)
- [从菜单 以语言 选择语言](#)
- [选择语言从这里](#)
- [Selecționer la limbaj preferat aici](#)
- [Seleccione Preferencia de idioma Aquí](#)
- [Wählen sie hier die Sprache](#)
- [Seleccione el lenguaje de preferencia aquí](#)
- [Selezionare la lingua di preferenza qui](#)
- [Burada Dil Tercihini Belirleysin](#)

English

Conflict Minerals Reporting Template (CMRT)

Revision 5.0
May 12, 2017

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

7) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy? (*)	Yes	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	http://www.hodine-electric.com/agency-approvals-regulatory-compliance/
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
H. Does your review process include corrective action management? (*)	Yes	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	