## Industrial Rivet & Fastener Co.

## **Conflict Mineral Policy**

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) adopted regulations under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The regulations enforce reporting and disclosure obligations on all publicly traded companies which file reports with the SEC under Section 13(a) or Section 15(d) of the Exchange Act. This includes domestic companies, foreign private issuers and smaller reporting companies to the extent that conflict minerals are necessary to the functionality or production of a product, or components thereof, that they manufacture or contract to manufacture. It covers issuers that manufacture a product by assembling it out of materials, substances, or components that are not in raw material form. Regardless of their place of extraction, the following are deemed conflict minerals: gold, columbite-tantalite, cassiterite and wolframite, including their derivatives, respectively tantalum, tin and tungsten.

Industrial Rivet & Fastener Co. is not a publicly traded company and the vast majority of products, including all of our standard products, do not contain conflict minerals. Certain special products incorporate tin, but only at the request of the customer. In such cases, we are committed to presenting conflict-free alternatives to those customers who require tin plated or bronze products. In 2014, we initiated an ongoing due diligence effort to gather information concerning the country of origin for potential conflict minerals in our supply chain. Industrial Rivet is collecting this information and will disclose any findings to our customers upon request.

William Goodman

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