



CONFLICT MINERALS STATEMENT & POLICY

In July of 2010, President Barack Obama signed into federal law the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"), which contains the imposition of various reporting requirements upon manufacturers whose products contain metals derived from minerals defined as "Conflict Minerals." These new reporting requirements reflect heightened concerns regarding the role that revenues obtained from the mining and transport of certain minerals play in financing the ongoing conflict in the Democratic Republic of Congo (the "DRC"). The term "Conflict Minerals" includes Columbite-Tantalite (Coltan), Cassiterite, Gold, Wolframate, and derivatives of the foregoing, limited to Tantalum, Tin and Tungsten. The countries adjoining the DRC include: Angola, Burundi, Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

Conval, Inc. ("Conval") fully supports the aims and objectives of the Dodd-Frank Act on the supply of Conflict Minerals. We endeavor to engage in all appropriate and necessary due diligence to ensure the responsible sourcing of materials, particularly with respect to all virgin metal we purchase, or all virgin metal that our machining suppliers purchase for our parts, that could be considered to be Conflict Minerals. As such, Conval requests each of its suppliers and vendors of virgin metal to conform to the Dodd-Frank Act and to provide all necessary declarations to evidence compliance including, but not limited to, the following expectations: (i) suppliers and vendors should not include in any products sold to Conval any Conflict Minerals that are not DRC Conflict Free; (ii) suppliers and vendors should develop Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflict Minerals that are not DRC Conflict Free from being included in the products sold to Conval; and (iii) Conval's suppliers and vendors are expected to source Conflict Minerals only from sources that are DRC Conflict Free. Further, with respect to any recycled or scrap metals purchased by Conval, such sources are deemed by rule to be DRC Conflict Free and require disclosure only as it relates to the conclusion that they are from recycled or scrap sources.

At the present time, Conval does not knowingly procure specified virgin metals that are not DRC Conflict Free. If we discover that our procured virgin metals are produced in facilities that are not considered to be DRC Conflict Free, we will endeavor to take appropriate actions to transition such products to be DRC Conflict Free.