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**Corporate Conflict Minerals Policy  
For  
UniMetal Surface Finishing LLC  
4/5/2021**

Prepared in compliance with  
Responsible Business Alliance (RBA)  
The Global e-Sustainability Initiative  
Conflict-Free Smelter Program  
And the  
Dodd-Frank Bill

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It is the practice & policy of UniMetal Surface Finishing LLC to purchase all metals used in our process from reliable, sustainable and conflict -free sources throughout the globe.

In order to meet this standard, we will:

Endeavor to certify that all potential conflict minerals suppliers have completed their due diligence in the sourcing of their raw materials and have supplied us with documentation to support this effort.

Maintain a current listing of these suppliers and the associated certifications on file for our customers so that they may also complete their required due diligence.

If, at any time we receive credible evidence that there may be inappropriate or questionable materials introduced to our supply chain, we will initiate an internal investigation to determine the source of said materials.

If it has been determined a supplier is found to be supplying minerals from one of the areas of concern, such as the DRC and the surrounding countries, we will inform the supplier of our findings and issue a corrective action requesting additional information to dispute the findings.

Should a supplier be unable to provide evidence to dispute the findings, the supplier will be given 90 days to procure another, certifiable source or risk losing preferred supplier status.

If, after the 90 days has elapsed, the supplier has failed to provide the necessary documentation, UniMetal will cease placing orders with said supplier until such time as they can certify their metals as conflict-free.

This policy shall remain in place until federal legislation requires us to modify or replace it.



Kim Bonatsos  
Supply Chain Leader  
UniMetal Surface Finishing LLC



George A. LaCapra Jr.  
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Patrick Hayden  
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