

MCL Industries, Inc. 660 Corporate Way P.O. Box 950 Pulaski, WI 54162 866-822-4100 | www.mcl.bz

## CONFLICT MINERALS STATEMENT

The recent enactment of US Congress HR 4173 (Dodd-Frank Wall Street Reform and Consumer Protection Act), specifically with regard to section 1502-Conflict Minerals, addresses serious issues and concerns within the supply chain for raw materials. This Conflict Minerals rule requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum, and gold) originating in the Democratic Republic of the Congo or adjoining countries.

MCL Industries, Inc. is a privately held corporation engaged in the assembly of electronic and electrical equipment, and thereby not required to file reports with the SEC in compliance with Section 1502 of the Dodd-Frank Act. While MCL Industries is exempt from this requirement, MCL Industries is aware of the related issues and developments as they impact the electronics supply chain. We are fully aware of the law and are committed to helping our customers comply with all reporting requirements.

Manufacturers of electronic components have made it clear that their distributors, and therefore their distributors' customers, are not equipped to provide this complex data to the end customer, as traditional distribution and privately held, small organizations are not within the scope of the law's reporting requirements; and those organizations do not have the resources required to collect and audit the information completely. However, MCL realizes the importance of this initiative and we fully support its intended results.

The Electronic Industry Citizenship Coalition Incorporated and Global e-Sustainability Initiative (EICC-GeSI) has created a template which eases the burden of sifting through multiple formats. It can be found at their website: <a href="http://www.conflictfreesmelter.org">http://www.conflictfreesmelter.org</a>. MCL Industries will be requiring all of our suppliers to provide us with complete conflict minerals declarations using the EICC/GeSI Conflict Minerals Reporting Template. We will reconsider our willingness to partner with suppliers that fail to comply with this policy.

We will strive to work cooperatively with our customer and supply chain partners in implementing conflict minerals compliance programs. Information from electronics manufacturers is becoming more readily available and MCL will continue its effort to facilitate the timely flow of information to assist our customers.