Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act referring to “Conflict Minerals”

December 2014

The Dodd Frank Wall Street Reform and Consumer Protection Act came into effect on January 1, 2013, and Section 1502 relates specifically to “Conflict Minerals”. Glenair Inc. takes this recent legislation on “Conflict Minerals” extremely seriously and has setup robust processes to ensure we comply with the legislation.

As part of our comprehensive due diligence:

- Have determined that certain Glenair products incorporate one or more of the identified “Conflict Minerals”.
- Created cross functional team to work with our suppliers to communicate the new requirements and ensure compliance that “Conflict Minerals” are not coming from conflict areas.
- Develop company policy on “Conflict Minerals” and management systems with respect to “Conflict Minerals” and have suppliers adopt similar policies and systems

To date, all Glenair suppliers who have responded to our survey, and to the best of our knowledge, have confirmed “Conflict Minerals” used in Glenair products are NOT mined from conflict areas.

Additionally, Glenair has continued to compile smelter names and includes them and other information on CFSI-CMRT templates.