

Würth Industry North America (WINA) – Conflict Minerals 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 to, among other things, require disclosure and reporting obligations on covered issuers regarding the use of conflict minerals which are necessary to the functionality or production of a product they manufacture or contract to manufacture.

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, such as automobile manufacturers 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, some are deemed conflict minerals: gold, columbite-tantalite, cassiterite and wolframite, including their derivatives, respectively tantalum, tin and tungsten, often referred to as “3TG.”

Although the **WINA** companies (**Würth Timberline Fasteners, Würth Adams Nut and Bolt, Würth Revcar, Würth Service Supply, Würth Snider Bolt and Screw, Würth Marine Fasteners and Würth Des Moines Bolt**) are not publicly traded companies, as industrial products and components distributors, we intend to voluntarily comply with the rules by not knowingly sourcing products containing conflict minerals from conflict countries, currently identified as the Democratic Republic of Congo or neighboring countries, as part of our commitment to our customers and our communities. WINA is committed to taking all steps to source product compliant with the legislation, and in 2012 initiated an ongoing due diligence effort to gather from its supply chain information concerning the product country of origin upon material receipt to allow identification of potential conflict minerals in the supply chain.

WINA expects its suppliers to commit to the Electronic Industry Citizenship Coalition (EICC) Code of Conduct (http://www.eicc.info/eicc_code.shtml) which includes a provision related to the responsible sourcing of minerals. Pursuant to that Code of Conduct, suppliers must have a policy to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture and/or supply are conflict free. WINA expects suppliers to establish their own due diligence program to ensure conflict-free supply chains. WINA also recommends that suppliers review the foregoing matters with their own independent consultants and advisors and WINA expressly disclaims any representations or warranties with respect to this Conflicts Mineral Policy.