

Blachford Conflict Minerals Policy

Blachford is committed to sourcing materials and components from companies that share our values around human rights, ethics and environmental responsibility. We require all suppliers to comply with applicable laws, regulatory requirements as well as the letter and intent of our Corporate Social Responsibility Policy (attached).

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). The Conflict Minerals Rule requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum and gold, or “3TG”) originating in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”).

Although Blachford is not a publicly traded company, we support the goal of ending violence, human rights violations and environmental devastation in the Covered Countries. Further, Blachford assists our customers in implementing their conflict minerals programs. We strive to work cooperatively with our customers and supply chain partners in implementing conflict minerals compliance programs.

Blachford requires all of our suppliers complete the attached conflict minerals declarations using the EICC/GeSI Conflict Minerals Reporting Template. We may reconsider our willingness to collaborate with suppliers that fail to comply with this Policy.



Matthew Taub
President/COO