



## Material Sourcing for Conflict Minerals Policy & Statement

In July 2010, the Wall Street Reform & Consumer Protection Act, also known as the “Dodd-Frank Act” was signed into law. Although the focus of the act is financial market regulatory reform, the ACT also creates new Securities and Exchange Commission (“SEC”) reporting requirements for publicly-Traded companies which sell products containing metals derived from minerals that have been defined as “Conflict Minerals”, including “Tantalum, Tin, Tungsten, & Gold. These requirements stem from Congressional concerns that the revenues obtained from the mining and transportation of the conflict minerals could be used to finance ongoing conflict in the Democratic Republic of Congo (DRC) and nine surrounding countries.

The FINAL RULES applying the Dodd-Frank Act adopted by the SEC on Aug. 22, 2012, impose the following:

- All publicly-traded companies will need to implement a system that allows them to determine the origin of the conflict minerals in the products they manufacturer or contract to other manufacturers.
- Additional, companies such as AMC, Inc. and its subsidiaries that supply products to publicly-traded companies may need to implement systems that allow supply chain transparency with regards to conflict minerals.
- These rules require a company to provide disclosures of the use of conflict minerals, and the origin of the conflict minerals used in their products in filings with the SEC.
- Companies required to file will be required to make their first SEC filing by May 31, 2014 for the 2013 calendar year, and by May 31 annually thereafter.

As required by Dodd-Frank Act, the U.S Securities & Exchange Commission (SEC) requires public companies to disclose whether they use certain materials sourced in the DRC. AMC, Inc. utilizes contract manufacturers for the production of our products, and as such does not purchase any of the subject materials directly from smelters or mines, therefore we rely on the source information provided by our suppliers\vendors. **AMC, Inc. declares and commits to refusing the application of metals from fighting regions; meanwhile, we request that our supply chain to:**

1. Conduct your operations in a way of social and environmental responsibility
2. Not use the conflict minerals originating from the Democratic Republic of the Congo (DRC) and it's adjoining counties
3. Make the same requirements to your upstream suppliers

*Minerals mined in Eastern Congo pass through the hands of numerous middlemen as they are shipped out of the Congo, through neighboring countries such as Rwanda or Burundi, to East Asian processing plants. Because of this, the US Conflict Minerals Law applies to material originating (or claimed to originate) from the DRC as well as the nine adjoining countries: Angola, Burundi, Central Africa Republic, Congo Republic (a different nation than DRC), Rwanda, Sudan, Tanzania, Uganda, and Zambia.*

### The Four Conflict Minerals

The term “Conflict Minerals” is defined as columbite-tantalite, also known as coltan (from which **TANTALUM**) is derived); cassiterite (**TIN**); **GOLD**; wolframite (**TUNGSTEN**); or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

**SEC advises companies to be prepared to report on this annually for compliance.**

*While AMC, Inc. will not be required to file with the SEC, as we are not publicly held, we anticipate many of our customers or their customers will have this requirement. We have already received a number of these inquiries and AMC, Inc. is working to develop policy and business processes to support our customers in fulfilling this requirement with the support of our supply base.*

Learn more about compliance by visiting:

[www.sec.gov/rules/final.shtml](http://www.sec.gov/rules/final.shtml)

[www.oecd.org/dataoecd/62/30/46740847.pdf](http://www.oecd.org/dataoecd/62/30/46740847.pdf)

<http://www.conflictreesourcing.org/>

AMC note: Revision History of changes only on MDL – outside distribution

U:\Tracy\Quality MASTER docs (AS9100 REV D)\Sec 8\_EXTERNAL PROCESSES(P-840)\Material Sourcing for Conflict Minerals Policy & Statement