



Statement on Conflict Minerals

Ward/Davis condemns the ongoing conflict and resulting humanitarian harm in the Democratic Republic of the Congo, which is fueled in part by financing from trade in the ores from which tin, tantalum, tungsten and gold are derived. These elements have come to be known as “conflict minerals”; when they originate in mines operated or taxed by the warring factions, they can be referred to as “conflict minerals from conflict mines.”

Conflict minerals are common constituents of products ranging from jewelry, toys and light bulbs to airplanes, vehicle airbag systems, and electronic and computer parts. Because the minerals in these products typically enter supply chains many layers removed from companies like Ward/Davis, it is difficult to determine whether they support armed conflict. At the same time, millions of Congolese workers rely on artisanal mining or work in legitimate mines to support a subsistence living. Avoiding purchase of all conflict minerals from the DRC region would cause severe hardship for them and their dependents.

To promote the advancement of fundamental human rights, Ward/Davis is committed to work toward eliminating from our products conflict minerals that support armed groups in the DRC or in the surrounding countries, while minimizing unintended consequences for legitimate subsistence miners and their dependents. Ward/Davis will:

- Continue to work toward the elimination, over time, of all conflict minerals from conflict mines in our products, and endeavor to improve, year-over-year, our ability to track conflict minerals in our supply chain, report on their origin, and eliminate those that originate in conflict mines.
- Comply with the requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, which requires companies to inquire into the origin of tantalum, tin, tungsten and gold in their supply chains and report on the reasonable inquiry or due diligence they conduct to determine whether their purchase supported armed groups in the DRC.

Ward/Davis expects its suppliers to reasonably assure that the tin, tantalum, tungsten and gold in the products they manufacture are conflict free. If Ward/Davis becomes aware of a supplier whose supply chain includes conflict minerals from conflict mines, Ward/Davis will take the appropriate actions to remedy the situation in a timely manner, including reassessment of supplier relationships. Ward/Davis expects our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.