



FORMERLY QUALITY ROLLING & DEBURRING

ISO 9001: 2008 CERTIFIED

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**Corporate Conflict Minerals Policy
For
UniMetal Surface Finishing LLC
12/13/2012**

Prepared in compliance with
The Electronics Industry Citizenship Coalition
The Global e-Sustainability Initiative
Conflict-Free Smelter Program
And the
Dodd-Frank Bill

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It is the practice and policy of UniMetal Surface Finishing LLC to purchase all metals used in our processes from reliable, sustainable and conflict-free sources throughout the globe.

In order to meet this standard we will:

Endeavor to certify that all potential conflict minerals vendors have completed their due-diligence in the sourcing of their raw materials and have supplied us with documentation to support this effort.

Maintain a current listing of these vendors and the associated certifications on file for our customers so that they may also complete their required due-diligence.

If, at any time, we receive credible evidence that there may be inappropriate or questionable materials introduced to our supply chain, we will initiate an internal investigation to determine the source of said materials.

If it has been determined a vendor is found to be supplying minerals from one of the areas of concern, such as the DRC and the surrounding countries, we will inform the vendor of our findings and issue a corrective action requesting additional information to dispute the findings.

Should a vendor be unable to provide evidence to dispute the findings, the vendor will be given 90 days to procure another, certifiable source, or risk losing preferred vendor status.

If, after the 90 days has elapsed, the vendor has failed to provide the necessary documentation, UniMetal will cease placing orders with said vendor until such time as they can certify their metals as conflict-free.

This policy shall remain in place until federal legislation requires us to modify or replace it.



Jim Murphy
Corporate Environmental Manager
UniMetal Surface Finishing LLC



George LaCapra Jr.
President
UniMetal Surface Finishing LLC



Patrick Hayden
Executive Vice President
UniMetal Surface Finishing LLC