Winkle Electric Company Policy

(QF Conflict Minerals Policy)

The Dodd-Frank Wall Street Reform Act, signed into law on July 2010, imposes Securities and Exchange Commission [SEC] reporting requirements on publicly traded companies whose product(s) may contain metals derived from minerals defined as "Conflict Minerals". These minerals include: tantalum, tin, tungsten, gold [3T & G] and their derivatives which may be mined in the Democratic Republic of Congo [DRC] and/or the surrounding countries.

Winkle Electric Company is a commercial off the shelf distributor and as such, does not design, manufacture, or control the content of the products we distribute. Being many supply chain layers removed from the mining and processing of raw materials, we neither have firsthand knowledge of their source, nor do we knowingly obtain and/or supply any component or product that contains conflict minerals.

Winkle Electric believes that the legal responsibility and obligation to identify the source and chemical/mineral makeup of any product lies with the component's manufacturer. Our Executive Management feels that by completing customer spreadsheets, documents, web links, or customer surveys attesting to the possible inclusion and source of conflict minerals create legal liabilities that we cannot accept. We are unwilling to be held accountable for possible incorrect or misleading information provided by others. Therefore, upon customer request, we will provide specific part number(s) and contact information in order for our customers to directly contact the manufacturer.

As due diligence, we will encourage our suppliers and their supply chains to source materials and products that are free from conflict minerals. We will expect our suppliers:

- Perform due diligence with their supply chain in identifying and eliminating sources of conflict minerals in their product(s).
- Disclose appropriate conflict mineral information to our customers upon request.
- Provide unsolicited notification of any product that contains raw material originating in the Democratic Republic of Congo and surrounding 'conflict' countries when known.

Contact your Winkle Electric Company Sales Representative for further information.

Approval: D Miller, Mgr of Quality Programs

Date: 9-10-15

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