

 Basler Electric	POLICY		DOCUMENT NO. PH100001
TITLE: Conflict Minerals Policy			Page 1 of 1
Author: Gary Emig	Created: 12/6/2012	Saved: Gary Emig	Last Rev.: 6/14/2013

Basler Electric Company and all subsidiaries (Basler) are committed to sourcing components and materials in a manner that respects human rights. This policy expands upon our Code of Conduct (see [Supplier Code of Conduct](#); FH100044) by further defining our sourcing intent with respect to conflict minerals.

Although Basler, as a privately-held company, is not directly impacted by the SEC Final Ruling on Section 1502 of Public Law 111-203 (Dodd-Frank Wall Street Reform and Consumer Protection Act), Basler supports its goals and objectives, as well as, the reporting needs of our valued Customers. The law aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Conflict minerals include: columbite-tantalite (coltan) (i.e. tantalum), cassiterite (i.e. tin), wolframite (i.e. tungsten), gold or their derivatives. The law includes provisions to expand the list of conflict materials as deemed necessary. Basler is committed to supporting the law and in enabling the reporting needs of our customer base through reasonable country of origin inquiry (RCOI) and due diligence measures.

Basler does not purchase conflict minerals directly from smelters or mines and is many layers removed from such sourcing. Consequently, Basler suppliers are similarly expected to support the goals and objectives of the law and to express the same expectations through their respective supply chains. Further, they are expected to exercise the necessary RCOI and due diligence measures that yield suitable conflict minerals status reporting to Basler.