



**Section 1502 of the Dodd-Frank Wall Street Reform and
Consumer Protection Act referring to “Conflict Minerals”**

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Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act relates specifically to “Conflict Minerals”. Under this Act, certain companies are required to disclose the use of “Conflict Minerals” in their products. “Conflict Minerals” refers to the metals tin, tantalum, tungsten, and gold that may have originated from the Democratic Republic of Congo (DRC) or an adjoining country. The Responsible Minerals Initiative (RMI) aims to minimize the use of mineral trade as a source of finance for conflict in the DRC. Glenair takes this legislation on “Conflict Minerals” extremely seriously and has setup robust processes to ensure compliance with the legislation.

As part of our comprehensive due diligence, Glenair has done the following:

- Determined that certain Glenair products incorporate one or more of the identified “Conflict Minerals”.
- Created a cross functional team to work with our suppliers to communicate the requirements and ensure compliance that “Conflict Minerals” are not coming from conflict areas.
- Developed company policy on “Conflict Minerals” and management systems with respect to “Conflict Minerals”, and have suppliers adopt similar policies and systems.

To the best of our knowledge, Glenair suppliers who have responded to our survey have confirmed “Conflict Minerals” used in Glenair products are responsibly sourced.

Glenair is continuously polling our vendors for updates, compiling smelter names, and reporting all relevant information on the Conflict Minerals Reporting Template (CMRT) developed by the RMI.

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