



Conflict Minerals Policy Statement

MGS Mfg. Group, Inc. (the “Company” or “MGS”) is committed to business practices that foster the health and safety of people. This includes support of Section 1502 of the United States Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”). MGS supports preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefiting from the sourcing of Conflict Minerals from that region.

Conflict Minerals refer to raw materials or minerals that come from a particular part of the world where conflict is occurring and affects the mining and trading of those materials. In particular, the United Nations has found that the trade of certain rare earth minerals is helping to finance the civil conflict in the Democratic Republic of the Congo (DRC), characterized by extreme levels of violence. These minerals are commonly referred to as “3TG” (tin, tantalum, tungsten, & gold).

MGS does not directly source 3TG from mines, smelters or refiners, and is in most cases several or more levels removed from these market participants. Nonetheless, MGS is committed to responsible sourcing of all minerals, including “3TG” as to not support conflict or human rights abuses in our own operations and within our supply chains. Suppliers are encouraged to adapt similar policies and undertake reasonable due diligence within their supply chains.

Suppliers who supply components, parts or products containing “3TG” are expected to source those minerals from ethically and socially responsible sources that do not directly or indirectly contribute to conflict. The Company expects Suppliers to declare any components, parts, and products that contain 3TG and further provide associated country of and other origin information. In addition, MGS expects our suppliers to implement controls on their supply chains consistent with MGS’ responsible sourcing commitment, so that they are able to provide us with this information and so that all of the “3TG” in the components, parts, and products that we purchase from them is “conflict free”.

This policy will be reviewed from time to time. MGS reserves the right to amend this policy to reflect changing circumstances.