

CONFLICT MINERAL POLICY

Jacks Winches is committed to sourcing materials from companies that share our values regarding human rights, ethics and environmental responsibility.

On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”) was approved by the U.S. Securities and Exchange Commission (“SEC”).

Conflict minerals include columbite-tantalite (coltan; i.e., tantalum); cassiterite (i.e., tin); wolframite (i.e., tungsten); gold or their derivatives.

The rule imposes reporting requirements on publicly traded companies subject to the SEC to annually report the presence of conflict minerals originating in the Democratic Republic of the Congo (“DRC”) or adjoining countries (“Covered Countries”) in the products they manufacture or contract to manufacture whereby the conflict minerals are necessary to the functionality or production of a product.

Jacks Winches supports the humanitarian goal of the Dodd-Frank Act in ending the illegal trade of conflict minerals originating in the DRC.

Jacks Winches is committed to:

- Avoiding the use of conflict minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries;
- Enabling transparency in our supplier relationships; and
- Building responsible supplier relationships;

In order to meet these commitments, Jacks Winches will routinely assess our suppliers’ compliance with this policy.

For more information, please contact:

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