



CONFLICT MINERALS SOURCING POLICY

Ward Manufacturing Company (Ward) is committed to supporting responsible sourcing of materials from suppliers that share our values, including compliance with all applicable laws. In this regard, Ward is committed to complying with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the related rules and regulations issued by the U.S. Securities and Exchange Commission, known as the “Conflict Minerals Rules”.

The Conflict Minerals Rules require publicly-held companies to perform due diligence to identify the extent to which their products contain Conflict Minerals. “Conflict Minerals” are minerals smelted into tin, tantalum, tungsten, and gold (3TG) originating from the Democratic Republic of Congo (DRC) and certain adjoining countries (“Covered Countries”). Although Ward is not a publicly-traded company, the goal of the Conflict Minerals Rules is to cut direct and indirect funding of any mines in the Covered Countries that are controlled by armed militias responsible for humanitarian abuses.

Ward is committed to complying with the Conflict Minerals Rules. It has always been our policy, as stated in Ward’s Code of Business Ethics, to comply with all applicable international, federal, state and local regulations including those relevant to the material acquisitions processes.

The minerals in Ward products originate from multiple sources of supply, and since Ward does not procure these metals directly from the mines or smelters, we rely on the support and cooperation of our valued suppliers to determine the origin of the minerals.

WARD EXPECTATIONS OF SUPPLIERS

Suppliers are expected to:

1. Adhere to the requirements of Ward purchase orders which state if any materials contain Conflict Minerals, they may not originate from the DRC or an adjoining country.
2. When requested by Ward, to provide reasonable objective evidence of the due diligence performed to ensure any 3TG material is Conflict Mineral-free.
3. Commit to be Conflict Mineral-free by sourcing only from Conflict Mineral-free” smelters.

Revision History

Date	Detail(s)
April 20, 2016	Original release
June 25, 2018	Revised throughout; added revision table.