

Conflict Minerals Policy Statement

Lowell Manufacturing Company ("Lowell") strongly believes that our customers should be fully informed about the products they purchase. As such, we are committed to the transparency of the supply chain by sourcing components and raw materials from reputable companies that share our values with regard to ethics, integrity, respect for human rights and environmental responsibility. We expect our suppliers to perform in accordance with these standards of conduct, including Conflict-Free Sourcing.

We are intent on complying with Section 1502 of the U.S. Wall Street Reform and Consumer Protection Act, also known as the U.S. Dodd-Frank Act. This provision of the law compels companies to discontinue the use of Conflict Minerals such as tantalum, tin, tungsten, and gold ("3TG") in their products that are proven to originate from the eastern provinces of the Democratic Republic of the Congo ("DRC"), or one of the nine African nations that share a border with the DRC ("the DRC Region"), where human atrocities are occurring in an ongoing civil war.

Lowell does not directly purchase raw metal ores that may be employed in the manufacture of our products from smelters or mines. Rather, we are several supply chain layers removed from the mining and processing of these metals, and as a result, we do not have first-hand knowledge of their source. Consequently, we strive to work in a cooperative manner with our supplier partners to insure a conflict-free supply chain, and are diligent in our efforts to comply with any requirements that may be applicable to our Company under the Conflict Minerals Rule. We support industry initiatives by the Electronics Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) to provide information on and enable companies to source conflict-free minerals.

Lowell requires all of our supplier partners to complete and return conflict minerals declarations utilizing the most recent EICC Conflict Minerals Reporting Template ("CMRT") from the link provided. We reserve the right to re-evaluate our discretion to partner with suppliers that fail to comply with the Policy.

http://www.conflictfreesourcing.org/conflict-minerals-reporting-template/

