



Conflict Minerals Policy

In August of 2012, the Securities and Exchange Commission (SEC) adopted a rule implementing the conflict minerals disclosure requirements of the Dodd-Frank Act, Section 1502, imposing requirements on manufacturers to determine if their products contain 'Conflict Minerals'. Conflict Minerals include, but are not limited to, Tin, Tantalum, Tungsten, and Gold (collectively known as 3TG).

Foxguard Solutions, Inc. supports this initiative, and similar initiatives worldwide, and has established a due diligence process for identifying and managing the sourcing of 3TG minerals. It is our intention to work to ensure that products and components in our supply chain do not contain metals sourced from smelters benefitting from conflict in regions such as the Democratic Republic of Congo (DRC).

This due diligence program includes:

- Educating our suppliers on conflict minerals issues and practices
- Collecting annual smelter information on Conflict Mineral Reporting Templates (CMRT)
- Working with suppliers to resolve any issues arising from potentially non-compliant smelters included in the collected information

While Foxguard is not an SEC reporting company, it is a supplier to such companies and incorporates supplier CMRT information into its own reporting template, which is available to customers upon request.

Foxguard realizes that tracing the origin of minerals is complex and time-consuming and sincerely appreciates the efforts of its suppliers as we work together to support this industry-wide effort.