



## **Conflict Minerals Policy**

In accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act, Whelen is making every effort to ensure that suppliers of tin, tantalum, tungsten and/or gold have Conflict Mineral Policies in place ensuring compliance to the requirements set forth.

Whelen is performing this due diligence by:

- Flowing down Conflict Mineral compliance requirements through the supplier purchase order terms and conditions. See Whelen QAP-001, Supplier Quality Requirements (website).
- Surveying suppliers and maintaining records of supplier Conflict Mineral statements of compliance and statements of compliance information provided in established information databases.
- Performing periodic audits of these suppliers and related products sold to Whelen, for traceability down to the mining source/location.

**January 3, 2014**