



VER-BOLT (PTY) LTD.

Reg. No. 80/08267/07

SPECIALIZE IN INDUSTRIAL FASTENINGS
ESTABLISHED IN 1980

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CONFLICT MINERALS POLICY

Ver-Bolt (PTY) LTD

Ver-Bolt is committed to being responsible corporate citizens. As part of that commitment, Ver-Bolt seeks to source products, components and materials from companies that share our values. Ver-Bolt understands the intent of the rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule" or the "Rule"), adopted by the U.S. Securities and Exchange Commission ("SEC"), regarding disclosure of conflict minerals sourced from the Democratic Republic of Congo ("DRC") and surrounding areas to promote ethical sourcing

The minerals at issue are cassiterite, columbite-tantalite, gold, wolframite and their derivatives, which are limited to tin, tantalum, tungsten, and gold (3TG), that originate from the DRC and adjoining countries. Revenue from the mining and transport of these minerals is believed to be financing or benefiting groups that are responsible for human rights violations. Ver-Bolt supports industry-wide efforts to identify and reduce the use of conflict minerals originating from the affected countries to the extent believed to be financing or benefiting groups committing human rights violations.

The Rule applies to a public company if conflict minerals are "necessary to the functionality or production" of a product manufactured or contracted to be manufactured by the company. As such, the Conflict Minerals Rule affects Ver-Bolt differently in its role as a distributor of products than in its limited role as a manufacturer. Ver-Bolt has developed and implemented processes appropriate to each of those roles in the supply chain.

The Conflict Minerals Rule requires certain companies to report annually to the SEC a description of measures taken to exercise due diligence on the source and chain of custody of conflict minerals in the manufacture of its products. Only a portion of Ver-Bolt's business involves "manufacturing" or "contracting to manufacture," as those terms are used in the Rule. In order to meet potential SEC reporting requirements for the limited number of products we manufacture or contract with others to manufacturer, Ver-Bolt periodically surveys suppliers that provide parts or components for those products to determine if they are using conflict minerals, the origin of any such conflict minerals, and the products in which they are used.

In its role of a distributor of products manufactured by others, Ver-Bolt supports its suppliers in their efforts to track conflict minerals in their supply chains and to educate customers about this issue. Suppliers to Ver-Bolt are expected to establish their own conflict minerals policies and to cooperate with Ver-Bolt in its efforts to identify any conflict minerals in its supply chain. Compliance with the Conflict Minerals Rule is important to Ver-Bolt, and we conduct due diligence within the standards set forth by the Conflict Minerals Rule. We continue to work with Assent, a compliance consulting company, to assist in the periodic collection of the requisite data from our suppliers and to provide our customers with additional information whenever possible.

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