

To: Atlas Mfg. Suppliers

Re: Conflict Minerals Policy

1/10/2018

In July 2010, President Barack Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. Among other things, this law directed the U.S. Securities and Exchange Commission (“SEC”) to enact rules obligating certain publically traded manufacturing companies to annually report whether the products they manufacture or contract to manufacture contain “Conflict Minerals” that are necessary to the functionality or production of those products. The SEC published its Conflict Minerals rule in August 2012. Under this rule, “Conflict Minerals” are essentially tin, tungsten, tantalum and gold that are mined either in the Democratic Republic of Congo (“DRC”) or one of nine African nations that share a border with the DRC (the “DRC Region”).

Atlas Mfg. fully understands the importance of the Conflict Minerals issue to its customers and is committed to supply chain initiatives that reflect Atlas’ overall corporate social responsibility and sustainability efforts that work towards a Conflict Free supply chain. We encourage all of our suppliers to likewise support these efforts.

You are receiving this letter because we require that products and/or services supplied to Atlas Mfg. are deemed “Conflict Free”. Even though Atlas Mfg. is not a publicly traded company, we support customers that are. It is Atlas’ intention to do what we can to ensure that all products and services, purchased within our supply chain, comply with the Dodd Frank Act.

Supplier Actions:

- Implement and communicate to their organizations and suppliers Conflict Mineral policies that are consistent with the Conflict Free sourcing process.
- Put in place procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable.
- Use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being Conflict Free, and require their direct and indirect suppliers to do the same.
- Advise Atlas Mfg. of any determination that the supplier either has concluded or has a reasonable basis to conclude that products or services that it currently sells or has sold to Atlas Mfg. are not Conflict Free.
- Maintain reviewable business records supporting the source of Conflict Minerals.
- Provide a copy of your Conflict Minerals Policy to Atlas.

Thank you for your understanding and cooperation. A copy of our Conflict Minerals Policy can be found on our website at www.atlasmfg.com.

Regards,

Yuriy Baron
Quality Engineer