

## **Conflict Minerals Policy**

Scott Fetzer (the “Company”) takes seriously concerns outlined in the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) regulating conflict minerals. This legislation requires the Company, through its parent company Berkshire Hathaway Inc., to report annually to the Securities and Exchange Commission (the “SEC”) on our worldwide use of certain minerals from the conflict region. The conflict region is defined as the Democratic Republic of Congo and adjoining countries.

In August 2012, the SEC issued the final rules for reporting of tin, tungsten, tantalum and gold used in manufacturing of products. These rules apply to minerals in the supply chain effective January 1, 2013 and must be reported in 2014. We support industry and regulatory efforts to enable companies to source conflict-free minerals and Scott Fetzer intends to be compliant with the Dodd-Frank Act provisions pertaining to conflict minerals. Scott Fetzer has initiated a comprehensive process to meet these regulatory obligations, taking steps to increase our supply chain due diligence measures and internal controls for the covered minerals.

Despite the foregoing, we recognize that our suppliers may have limited insight into their supply chains which precludes them from fully understanding the origin of the minerals. Due to the size of our supply chain as well as the complexity of the routes by which these conflict minerals are traded, smelted, recycled, and sold (including the common practice of mixing ores and recycled scrap from many different sources), Scott Fetzer and its suppliers face a substantial challenge to obtain full traceability for all minerals to exact origin with a high degree of certainty.

We are guided by our Statement of Ethical Values and Code of Conduct (the “Code”), which forms the foundation of our core commitment to act with integrity. The Code applies to every officer and employee, whether they work for Scott Fetzer, or for one of our subsidiaries in the United States or worldwide. Our employees agree under the Code to uphold the Company’s values, including honesty, respect, responsibility, fairness and the free exchange of ideas. We are committed to doing business fairly and responsibly and to seeking business partnerships with those who share our commitment to transparent, ethical relationships. We expect these things of our employees, and we expect our suppliers to do the same.

It is a Company priority to maintain and protect the integrity of our supply chain. When we select any business partner, we consider not only the quality of the goods or services they provide, but also that company’s commitment to lawful, fair business practices. When a supplier signs a Scott Fetzer purchase order under Scott Fetzer’s standard terms of purchase, they agree that they operate in compliance with all applicable federal, state and local rules, laws, codes and regulations.

Further, suppliers who sign our purchase orders are generally obligated to allow us to conduct audits of their performance. Those suppliers who do not comply with laws or operate in a manner that is inconsistent with our Code will be terminated as a Scott Fetzer supplier.

Violations of this policy can be reported through our Ethics Officer which can be accessed by calling 440-892-3008, or by email addressed to [jsharp@scottfetzer.com](mailto:jsharp@scottfetzer.com) at any time.