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Conflict Minerals Policy

Tulsa Winch, Inc. and its Operating Companies (“TWG”) are committed to sourcing components and materials from companies that share our values regarding human rights and social responsibility.

TWG intends to comply with the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), which aims to prevent the use of Conflict Minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or an adjoining country as defined in the Act. “Conflict Minerals” include: columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives. The Act requires Dover to perform due diligence with respect to the sourcing of Conflict Minerals and to report annually on its use of Conflict Minerals and origin of such minerals.

TWG suppliers are required to comply with TWG's Supplier Code of Conduct, which includes requirements relating to Conflict Minerals and responsible sourcing. Relevant suppliers are responsible for passing these same requirements on to their suppliers. We expect our suppliers to implement a process to reasonably assure that the Conflict Minerals contained in the products provided to Dover do not perpetrate human rights abuses in the DRC or an adjoining country.