

Conflict Minerals Policy

Davis Tool, Inc. fully supports the goals and objectives of Section 1502 ("Section 1502") of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"), which aims to prevent the use of certain "Conflict Minerals" that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries (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 and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State.

Davis Tool, Inc. avoids the use of Conflict Minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Davis Tool, Inc. complies with the reporting obligations required under Section 1502 of the Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission, including the requirement that Davis Tool, Inc. conduct inquiries into the source of any Conflict Minerals included in its products.

Davis Tool, Inc. suppliers are required to acknowledge Davis Tool, Inc.'s Conflict Minerals Policy, which includes requirements regarding Conflict Minerals and responsible sourcing. Suppliers are also responsible for passing the same requirements on to their suppliers.

Suppliers are required to declare that all products supplied either:

1. Do not contain tantalum, tin, tungsten or gold that are necessary to their production or functionality, or,
2. If they do contain these minerals, that they originate from non-conflict areas or from smelters that have been validated by an independent private sector party to be conflict free.

Davis Tool, Inc. maintains an active log of all suppliers and their conflict mineral status. Our suppliers have informed us their products do not contain conflict minerals or their products contain conflict minerals that originate from non-conflict areas.

Davis Tool, Inc. evaluates its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. Davis Tool, Inc. reserves the right to request additional documentation from its suppliers regarding the source of any Conflict Minerals included in its products. In addition, suppliers must maintain and provide to Davis Tool, Inc. upon request traceability data for a minimum of five years. Suppliers who do not comply with these requirements are reviewed by Davis Tool, Inc.'s supply chain organization for future business.

Ron Davis, Jr.
President
Davis Tool, Inc.

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