



June 2017

Policy on Conflict Minerals

Bodine Electric Company is committed to eliminating conflict minerals from our supply chain and to comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. As a privately held company, we are not subject to the SEC disclosure requirement of the Dodd-Frank Act, however to support our customers and to demonstrate our commitment to adhere to all laws and regulations relating to environmental, occupational safety and health, transportation, labor practices and material content, we have implemented this policy and due diligence reporting activities with our supply chain to ensure that our metals suppliers are DRC conflict-free.

To achieve these goals, Bodine Electric requires its supply chain partners to only use smelters/refiners verified to be compliant with the EICC/GeSi Conflict-Free Smelter Program and to provide Bodine Electric with a completed Conflict Minerals Reporting Template available at www.conflictreesmelter.org.

In addition suppliers of materials that contain tin, tantalum, tungsten or gold are expected to:

- Declare that any material, part, sub-component, component or finished product supplied to Bodine Electric either directly or via a third party does not, to the best of its knowledge, contain any conflict minerals originating from the Democratic Republic of Congo or its adjoining countries as defined in section 1502 of the Dodd – Frank Act and its affiliated laws or regulations.
- Proactively undertake due diligence and continuous monitoring of the supply chain to avoid direct or indirect procurement of Conflict Metals.
- If a Supplier becomes aware of the use of metals that have been derived from Conflict Minerals in any goods supplied to Bodine Electric, it shall immediately notify Bodine Electric. Such notification shall include any tracking information to specify which goods may contain these metals.

The attached EICC/GeSi Conflict-Free Minerals for Bodine Electric Company contains the current reporting status for our company and is updated quarterly to reflect any changes in our supply chain.

Further questions regarding this policy can be directed to info@bodine-electric.com.



An Initiative of the EICC and GeSI

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Conflict Minerals Reporting Template (CMRT)

Revision 5.0
May 12, 2017

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Bodine Electric Company
Declaration Scope or Class (*):	A. Company
Description of Scope:	Company-wide
Company Unique ID:	36-0821210
Company Unique ID Authority:	DUNS
Address:	201 Northfield Road, Northfield, IL 60093 USA
Contact Name (*):	Sherry Webber
Email - Contact (*):	sherry.webber@bodine-electric.com
Phone - Contact (*):	563.690.5929
Authorizer (*):	Jason Limmex
Title - Authorizer:	Procurement Strategy Manager
Email - Authorizer (*):	jason.limmex@bodine-electric.com
Phone - Authorizer (*):	563.690.5973
Effective Date (*):	23-Jun-2017

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	Unknown	
Gold (*)	Unknown	
Tungsten (*)	No	

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	Unknown	Some suppliers are still reviewing their sources and cannot make full declaration
Gold (*)	Unknown	Some suppliers are still reviewing their sources and cannot make full declaration
Tungsten (*)	No	

5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum (*)	100%	
Tin (*)	Greater than 75%	Some suppliers are still reviewing their sources and cannot make full declaration
Gold (*)	Greater than 75%	Some suppliers are still reviewing their sources and cannot make full declaration
Tungsten (*)	100%	

6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	No	
Gold (*)	No	
Tungsten (*)	Yes	



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7) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy? (*)	Yes	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	http://www.hodine-electric.com/agency-approvals-regulatory-compliance/
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
H. Does your review process include corrective action management? (*)	Yes	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	