



REVERE COPPER PRODUCTS, INC.

POLICY REGARDING CONFLICT MINERALS

Purpose

The purpose of this policy is to set forth the policy of Revere Copper Products, Inc. (“Revere”) with respect to the use of Conflict Minerals in its products. Revere intends not to use Conflict Minerals in its products. While Revere has investigated its practices and has found that it is unlikely that any Conflict Minerals or their derivatives are used in any of Revere’s products, Revere is committed to continuously evaluating its supply chain to prevent the incorporation of Conflict Minerals into its products.

Background

Conflict Minerals are those minerals mined in areas of the world where there are armed conflict and human rights violations. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and its implementing regulations (the “Act”) implement disclosure requirements for certain publicly-traded companies which purchase or use Conflict Minerals. While Revere is not subject to Section §1502 of the Act, Revere has established this policy to assist its customers and vendors in meeting their compliance obligations.

Policy Statement

Currently, Conflict Minerals consist of Columbite-Tantalite (Coltan), Cassiterite, Gold, Wolframite, or their derivatives, or any other mineral or their derivatives, as determined by the Secretary of State. Revere is taking appropriate measures to confirm that the metals used in its products (at this time, only Tin) are sourced from “conflict-free” mines. These measures will include the following activities:

- Communicating this policy to Revere’s suppliers and customers;
- Where possible, requesting that Revere’s suppliers provide it with certifications regarding the minerals purchased by Revere;
- Investigating any information Revere receives from employees, suppliers or other business partners which indicates that any minerals it uses are Conflict Minerals;
- If necessary, terminating relationships with suppliers which Revere finds to have been providing Revere with Conflict Minerals;
- Establishing the Quality/Process Engineering Manager as Conflict Minerals contact person for enforcing this policy and answering any questions.

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