

CONFLICT MINERAL POLICY

Wells Vehicle Electronics complies with law and regulations and is committed to ethical excellence. Wells Vehicle Electronics procurement policy requires our suppliers to provide certifications and other documentation necessary to complete our good faith reasonable country of origin inquiry as required under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Moreover, Wells Vehicle Electronics is aligned with industry efforts to responsibly purchase components and raw materials which contain gold, tantalum, tin and tungsten (“3TG Metals”) solely from sources which do not support conflict in the Democratic Republic of Congo or its bordering countries.

To support our efforts and our commitments, our goal is to identify 100% of the smelter or refiner sources of 3TG Metals in our supply chain. We also encourage all of our suppliers to only source 3TG Metals from smelters and refiners that participate in third-party audit programs such as the Conflict Free Smelter Program or the London Bullion Market Association accreditation program-or to encourage non-participating smelters to participate. If we become aware of instances where 3TG Metals in our supply chain potentially finance armed groups (as defined in the SEC’s conflict minerals rule), we will work with our suppliers to find alternate certified conflict-free sources.

Thomas Schaefer
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