

TRUCK-LITE CORPORATE POLICY

Department : **PURCHASING**

Number: **015**

Original Date: **7/22/14**

Subject : **CONFLICT MINERALS
POLICY FOR SUPPLIERS**

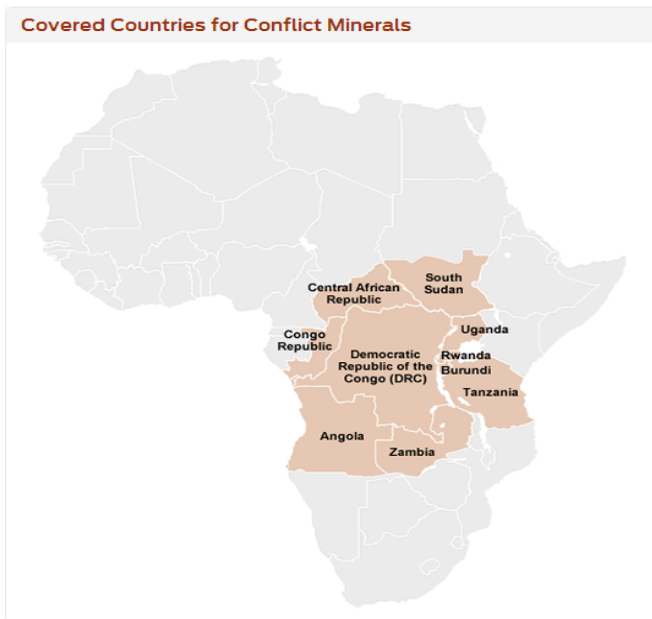
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Conflict Minerals Policy For Suppliers to Truck-Lite Co., LLC & Subsidiaries

Truck-Lite has chosen to follow Section 1502 of the Dodd Frank Act which supports the use of conflict-free minerals in its products. We have taken due diligence steps such as the development of a conflict minerals policy as outlined herein, as well as surveying our suppliers, to ensure sourcing of conflict-free minerals.

Truck-Lite has taken steps to develop and implement a policy prohibiting use of cassiterite (tin ore), wolframite (tungsten ore), coltan (tantalum ore), gold, and their derivatives (collectively, "Conflict Minerals"), whose extraction or trade supports conflict in the Democratic Republic of Congo and adjoining countries as identified in the map below (collectively, "DRC"), and/or contributes to inhumane treatment, including human trafficking, slavery, forced labor, child labor, torture and war crimes in the region.



As a guideline we will use the EICC- GeSI (CMRT) due diligence tool to communicate up and down our supply chain. Once a validated supply chain is established by suppliers through initiatives such as full-fledged smelter verification under EICC-GeSI's Conflict-Free Smelter Program or development of a mineral tracing program, we will require our suppliers to procure the minerals through that validated supply chain.

Our efforts are not intended as an overall ban on procurement of minerals from the DRC and adjoining countries, but rather to assure sourcing from responsible sources in the region.

Issued By: B. Ives

Approved By:

Brian Kupchella

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Truck-Lite has established a cross-functional team to address the challenge of Conflict Minerals in the supply chain. This team is led by our Executive Vice President of Business Development and Chief Compliance Officer and is supported by various departments including Purchasing, Product Development, Corporate Environmental Health Safety and Security, Materials Management, Finance, and Corporate Counsel. The Purchasing organization has the primary responsibility for working with suppliers to obtain information on products that may contain Conflict Minerals, as well as tracking and documenting Truck-Lite's progress and generating required reporting.

Suppliers are expected to supply materials to Truck-Lite that are DRC conflict-free. No supplier should procure Conflict Minerals that originate from facilities in the "Conflict Region" that are not certified as "conflict free".

DRC Conflict-free means (1) any Conflict Minerals necessary to the functionality or production of supplied materials which do not directly or indirectly finance armed groups through mining or mineral trading in the DRC or an adjoining country or contribute to inhumane treatment in the region, or (2) any Conflict Minerals in supplied materials are from recycled or scrap sources.

Conflict Minerals are from "recycled or scrap sources" if they are from recycled metals, which are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten, and/or gold. Minerals partially processed, unprocessed, or a "bi-product" from another ore are not included in the definition of recycled metal.

Suppliers are expected to adopt policies and management systems with respect to Conflict Minerals that are consistent with Truck-Lite's policy and to require their suppliers to adopt similar policies and systems.

Truck-Lite suppliers are expected to pass the EICC-GeSI public Conflict Minerals Reporting Template (http://www.conflictreesourcing.org/media/docs/CFSI_CMRT3-01.xls) to their suppliers and successively upstream until the smelter/refiner is identified. The survey information must then be passed back down through the levels of the supply chain to Truck-Lite's direct supplier.

Supplier agrees to cooperate with Truck-Lite if Supplier does not know the original source of the minerals, and disclose from whom Supplier purchased the minerals and require others to disclose such information, so that the original source of minerals can be accurately determined and reported.

Supplier shall provide such further cooperation as Truck-Lite may reasonably require without any further compensation in order to meet any obligations it may have under Conflict Minerals laws, rules and regulations, including, without limitation, under Dodd-Frank Section 1502.

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Supplier will respond truthfully and accurately to Truck-Lite's survey or request for information.

If Truck-Lite discovers the use of the Conflict Minerals produced in facilities that are considered to be "non-conflict free", in any material, parts or components that we procure, Truck-Lite will take appropriate actions to transition product to be "conflict free".

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