



Payton's Conflict Mineral Policy

General Information: Armed groups operating in the eastern Democratic Republic of the Congo (DRC) have controlled many of the region's mines and have engaged in armed conflict, as well as some of the world's worst human rights violations.

Concern of this situation led the U.S. Congress to pass the Dodd-Frank Wall Street reform and rules, which were signed into law on July 21, 2010.

Those rules require publicly-traded companies to disclose whether the products they manufacture or contract to manufacture, contain "Conflict Minerals" which are necessary to the functionality or production of those products.

The conflict minerals are tin, tungsten, tantalum and gold.

Companies using conflict minerals must also disclose their supply chain to verify whether these minerals originated in the DRC or adjoining countries.

Payton supports the ending the violence and human rights violations in the mining of minerals from the Democratic Republic of Congo (DRC) and surrounding countries.

Payton's commitment:

- Do not knowingly purchase and use metals originate from facilities in the "Conflict Region" (that are not certified as "conflict free").
- Send surveys to our suppliers: Payton's suppliers are expected to fill the EICC-GeSI public Conflict Minerals Reporting Template. The suppliers are expected to pass this Template upstream to their suppliers, until the smelter is identified.

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