

Conflict Minerals and Cobalt Policy

In August 2012, the United States Securities and Exchange Commission (“SEC”) issued its final rules regarding “Conflict Minerals” (known as ‘3TG’ – **Tantalum, Tin, Tungsten and Gold**) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo (DRC) and the adjoining countries named in the Act.

In addition, DRC is the world’s largest producer of cobalt and holds more than 50 percent of the global cobalt reserves. Demand for **Cobalt** is expected to rise significantly over the coming years. Multiple reports have highlighted concerns over social and environmental impacts of cobalt extraction, including inhuman working conditions in cobalt mining.

vimi fasteners strives to be a good corporate citizen and recognizes the need to prevent the extraction and trade of minerals with significant adverse impacts, including serious human rights, abuses and conflict to ensure the health, safety and protection of people who come into contact with our products and business, and we require high social, environmental and human rights standards among our suppliers.

Vimi fasteners’ commitments

We are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries. Therefore, we are committed to:

- identifying which vimi fasteners products are impacted and targeting our efforts accordingly
- not buying products and materials containing Conflict Minerals directly from Conflict Mines
- avoid knowingly using cobalt from sources that support of fund inhumane treatment, including human trafficking, slavery, forced labour, child labour, torture and war crimes in known regions of conflict in the vicinity of the Democratic Republic of Congo and surrounding countries
- asking our suppliers to work towards ensuring that any Conflict Minerals and Cobalt contained in the products and materials supplied to vimi fasteners do not originate from Conflict Mines

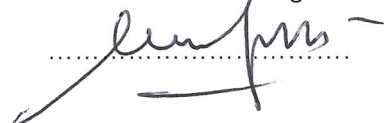
vimi fasteners’ measures

In working towards these commitments, we have taken a number of steps that include:

- establishing a policy supported and sponsored by vimi fasteners’ Board of Directors to verify the use of Conflict Minerals and Cobalt in our products
- updating the purchasing terms and conditions to reflect this policy
- requiring our suppliers to implement a policy regarding Conflict Minerals and Cobalt and exercise due diligence to investigate the source of these minerals
- engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. In the future, our suppliers’ willingness to comply with this initiative will be a factor in our sourcing decisions

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The General Manager



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