



Conflict Minerals Policy

Background

In recent years there has been increased concern that the exploitation and trade of certain minerals originating in the Democratic Republic of the Congo and surrounding countries are helping to finance armed conflict characterized by extreme levels of violence. Tin, tantalum, tungsten and gold are commonly referred to as "conflict minerals" regardless of their country of origin. As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the U.S. Securities & Exchange Commission ("SEC") has adopted a rule to bring greater supply chain transparency to the use of conflict minerals originating from the Democratic Republic of the Congo and surrounding countries. The SEC's Conflict Minerals Rule requires SEC registrants who manufacture or contract to manufacture products containing conflict minerals that are necessary to such products' functionality or production to disclose the origin and status of the conflict minerals.

Policy Statement

Western Diversified Plastics, together with its subsidiaries, is committed to corporate responsibility and to respecting human rights in its own operations and in its global supply chain. Western Diversified Plastics is committed to complying with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, as well as the SEC's

Conflict Minerals Disclosure Rule. As part of that commitment, Western Diversified Plastics will seek to identify, reduce and ultimately eliminate the use in its products of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and surrounding countries.

To aid in our compliance, Western Diversified Plastics has required that applicable suppliers to Western Diversified Plastics of products containing conflict minerals:

- commit to identifying, reducing and ultimately eliminating the use in materials supplied to Western Diversified Plastics of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and surrounding countries;
- work with their own upstream suppliers and supply chain to determine the source and chain of custody of any products containing conflict minerals supplied to Western Diversified Plastics;
- establish their own policies, due diligence frameworks and management systems for the traceability of conflict minerals consistent with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, and communicate an expectation to their suppliers that they do the same; and
- cooperate with Western Diversified Plastics in its efforts to comply with any applicable reporting requirements of governmental agencies (including without limitation the SEC Conflict Minerals Disclosure Rule).