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DOCUMENT TITLE

CONFLICT MINERALS STATEMENT AND POLICY

PURPOSE

Establish a durable policy to address “Conflict Minerals” reporting and compliance for Orchid Monroe, LLC

REVISION HISTORY

Revision	Change Description	Effective Date
0	New Policy	07/15/14
1	Updated to reflect management change	02/11/15
2	Updated to reflect management change to Joe Fontana	06/28/16
3	Updated to Reflect Management Change	10/19/17

APPROVALS

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CONFLICT MINERALS STATEMENT AND POLICY

We are committed to the responsible sourcing of materials that may include “conflict minerals” throughout our supply chain and to continuing to comply with the underlying SEC rules and regulations surrounding “conflict minerals”.

Orchid Monroe, LLC being a privately held contact source for parts and materials contracted by both publically traded and private companies will:

- 1) Request and report Conflict Minerals declarations related specifically to those materials specified and procured for Customer parts by contract to our Customers.
- 2) Report to our Customers any discrepancies we find including a material suppliers failure to reports. This clause is pertinent especially in circumstances where the Customer purchases the material or designates the source of the material outside of Orchid Monroe, LLC direct control.
- 3) Request a waiver for instances where reporting by the Conflict Minerals materials declaration is considered inadequate by the Customer. Orchid Monroe, LLC will make every attempt to resolve reporting issues with the supplier but ultimately the decision to use materials that do not comply with the Dodd-Frank Act of 2010 will be that of the Customer.


Operations Manager (Orchid Monroe, LLC.)

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