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Precision Machined Parts and Fabrications

Conflict Minerals Policy Statement

JBK Manufacturing & Development Co. (JBK) is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, JBK seeks to source products, components and materials from companies that share our values around human rights, ethics and environmental responsibility.

In August 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain "conflict minerals" originating from the Democratic Republic of the Congo (the "DRC") or adjoining countries. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations. "Conflict minerals" refers to columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location or origin of the minerals or derivative metals.

While JBK is not required to report to the SEC, many of its customers do and in this relationship we are obliged to meet their requirements. JBK supports industry-wide efforts to identify, reduce and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations. JBK is committed to complying with any applicable requirements under the Conflict Minerals Rule and has implemented a due-diligence process to meet its obligations under the legislation.

Suppliers to JBK are expected to establish their own conflict minerals policies, due diligence framework and management systems that are designed to prevent conflict minerals originating from the DRC or an adjoining country, to the extent that they benefit groups committing human rights violations, from being included in the products sold to JBK. In the event JBK determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, JBK reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.

Sincerely,

James Gibbs
General Manager
March 15, 2018