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Conflict Minerals Policy

The U.S. Congress included provisions in the Dodd-Franks Wall Street Reform and Consumer Protection Act of 2010 to address conflict minerals, which restrict the use of Tin, Tungsten, Tantalum and Gold and their ores mined in the Democratic Republic of Congo (DRC) or adjoining countries. Pursuant to those provisions, in August 2012 the Securities and Exchange Commission (the SEC) issued its final rules for disclosure and reporting requirements regarding the use of conflict minerals from the DRC.

Safe Fleet, as a privately held corporation, doing business under the brand names of R•O•M, FRC, FoamPro, Prime Design, Bustin, Specialty Manufacturing, Pretoria and Transpec, is not subject to the Conflict Minerals reporting requirements. However, as a supplier to publicly-traded companies, we are committed to helping our customers comply with their reporting requirements. In addition, Safe Fleet is fully supportive of global industry efforts to ensure responsible manufacturing processes with transparent sourcing in full accordance with the law. We are pursuing full compliance through our supply chain and are working closely with both suppliers and customers to meet these legal requirements.

The legislation allows companies a two-year period to report themselves as “conflict undeterminable” as they develop processes and procedures to ensure compliance, and we have begun the assessment process with our supply base to determine compliance levels. While many Safe Fleet suppliers can definitively report that they do not procure conflict minerals, the complex path of processing, refining, and fabrication required to bring products to market makes it difficult, if not impossible, to trace the origin of the component minerals. Due to these complexities, Safe Fleet is currently unable to verify the origin of all the metals used in our products today. Despite these challenges, it is the stated policy of Safe Fleet to refrain from purchasing from any known conflict sources, and we expect our suppliers to adhere to the same standards. To the best of our knowledge, products supplied by Safe Fleet are in compliance with the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act. No Safe Fleet products contain any intentionally-added materials that are prohibited from use in this directive and, therefore, do not rely on any exemptions to be in compliance.

In both the letter and spirit of these provisions and rules, Safe Fleet will continue its efforts to find ways to eliminate conflict minerals from our supply chain.

Ken Koblinski
VP Supply Chain
Safe Fleet