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## **GROTH CORPORATION**

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## Continental Disc Corporation Raw Material Procurement Policy Conflict Free Minerals in compliance with the Dodd Frank Act – Section 1502

Continental Disc Corporation is a leading manufacturer of rupture disc (bursting disc) devices for a variety of process industries, including chemical, petrochemical, petroleum refining, pharmaceutical, beverage, food and dairy, aerospace, gases, electronics, and other markets worldwide. At our heart, we are a safety company. We are committed to ensuring the safety, health and protection of the environment and of the people who come in contact with our products. As responsible corporate citizens, we meet and are continually striving to exceed governmental, industrial and environmental standards worldwide.

We condemn all activities in connection with the unlawful exploitation of mineral resources, no matter where such activities take place. As part of this commitment, we have implemented an on-going policy of only purchasing raw materials that are conflict-free and that meet the requirements of the OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Continental Disc and is subsidiaries fully support the position of the EICC and the Organization for Economic Co-operation and Development (OECD) to avoid the use of ores and metals that finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries. Continental Disc also is aware of section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pertaining to "Conflict Minerals" and the regulations promulgated thereunder by the U.S. Securities and Exchange Commission. This law refers to tin, tantalum, tungsten, and gold as "conflict minerals," independent of whether or not they are actually sourced through conflict-free supply chains.

Continental Disc Corporation only procures finished product that may contain minerals such as tantalum, gold, tin or tungsten. Prior to procurement, we verify that the suppliers and their supply chain is conflict free. Continental Disc maintains a system for tracing products back to Conflict Free Smelters and documents that all purchased materials are from non-conflict sources.

Shane Bacon

**Director of Quality and Compliance** 

**Continental Disc Corporation** 

Amit Desai

Director of Supply Chain
Continental Disc Corporation

Amit Derai