

# Conflict Minerals Policy

## **INTRODUCTION**

Proceeds from the mining of certain minerals in the Democratic Republic of Congo (the “DRC”) and countries adjoining it have been linked to violations of human rights through the funding of illegal armed groups. In accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), the United States Securities and Exchange Commission (the “SEC”) requires publicly traded companies to report on the origin of these conflict minerals. Tantalum, tin, tungsten and gold are the derivative metals covered under this regulation.

The following policy has been developed and is consistent with the Corporate Social Responsibility Policy of Roaring Spring Blank Book Company.

## **POLICY**

Roaring Spring Blank Book Company is committed to conducting its business operations in a manner that complies with applicable laws and regulations regarding conflict minerals. To comply with these requirements, Roaring Spring Blank Book Company is committed to:

- Informing its direct suppliers about this Conflict Minerals Policy.
- Working with its direct suppliers and sub-suppliers to understand the chain of custody for conflict minerals at least to the smelter or refiner level.
- Source parts and components from its direct suppliers and sub-suppliers that are DRC conflict-free.
- Require suppliers to undertake reasonable due diligence within their supply chain to determine the chain of custody and origin of tantalum, tin, tungsten and gold used in their products.
- Comply with information requests on the source and origin of tantalum, tin, tungsten and gold used in products manufactured by Roaring Spring Blank Book Company.