

Ripley Tools

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Conflict Minerals Statement – Supplier Declaration

Hubbell Power Systems, Inc., Ripley Tools Division

RE: Section 1502 Dodd-Franks Wall Street Reform and Consumer Act "Conflict Minerals"

Ripley will take every reasonable precaution to ensure that our products do not contain "Conflict Minerals" as outlined in section 502 of the Dodd-Frank Wall Street Reform and Consumer Act. However, due to the global nature of our supply chain, we cannot definitively ensure 100% compliance.

Ripley manufactures components made of tool steel that may contain tungsten (W) as part of the overall composition. Our sources of the base material are industrial distributors and not the primary steel manufacturers who create the raw materials. Since the raw materials come from worldwide steel makers through several layers of distribution, it is impossible for us to determine whether any of the constituents originated in the Republic of the Congo. Many of the higher carbon tool steels that are used for our blades are smelted and formulated overseas (Germany, Sweden, Asia) making it even more difficult to determine the origins of the iron ore or alloying materials.

In good faith and to meet our commitment to our customers, we have worked with our two largest steel suppliers and they in turn, have not been able to track through the countries of origin for the raw materials.

Sincerely,

Brian Bourgoin Senior Engineering Manager Hubbell Power Systems, Inc., Ripley Tools division

