



Conflict Minerals Policy

Jackson Aerospace, Inc. is fully committed to the responsible sourcing of “Conflict Minerals” from the Democratic Republic of the Congo (DRC) and adjoining countries. “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. 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. 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 (DRC) or adjoining countries.

Although Jackson Aerospace is not a publicly traded company, we intend to comply with the rules as part of our commitment to our customer and our community. Jackson Aerospace supports the objectives of the SEC’s rules and will perform all necessary due diligence in order to avoid the use of “Conflict Minerals” that have funded armed groups in the DRC region to further the goal of ending the human rights violations in the region. We expect our suppliers to support our efforts and to take steps to ensure that “Conflict Minerals” that have funded armed groups are not used in materials supplied to Jackson Aerospace. In this regard, Jackson Aerospace is actively engaging with suppliers that provide materials that may contain “Conflict Minerals” and requiring their cooperation to see that the necessary due diligence with respect to the source of “Conflict Minerals” in materials supplied to Jackson Aerospace is conducted.

Jackson Aerospace’s Commitment and Expectations of Our Suppliers:

- Fully support the objectives of the U.S. legislation and SEC rules on the supply of “Conflict Minerals.”
- Not knowingly procure or supply products or materials that contain “Conflict Minerals” that fund conflict in the DRC region.
- Require our supply base to perform due diligence to see that they are using only those sources of “Conflict Minerals” that are certified as “Conflict Free.”
- Require our supply base to provide written evidence documenting that the materials used in products or materials supplied to us are “Conflict Free.”

If it is discovered that one or more of our suppliers are providing non-conflict free material, Jackson Aerospace will take appropriate actions to transition the product to be “Conflict Free.”