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ETCO Incorporated

Conflict Minerals Policy

Purpose

The intent of this document is to set forth the policy of ETCO Incorporated (“ETCO”) with respect to the use of Conflict Minerals in its products. ETCO does not intend on the use of Conflict Minerals in any of its products. While ETCO has investigated its practices and has found that it is highly unlikely that any Conflict Minerals or their derivatives are used in any of ETCO’s products, ETCO is committed to continuously evaluating its supply chain to prevent the incorporation of Conflict Minerals into its products.

Background

Conflict Minerals are those minerals mined in areas of the world where there are conditions of armed conflict and human rights abuses. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and its implementing regulations (the “Act”) implement disclosure requirements for certain publicly-traded companies which purchase or use Conflict Minerals. While ETCO is not subject to Section §1502 of the Act, ETCO has established this policy to assist its customers and vendors in meeting their compliance obligations.

Policy Statement

Currently, Conflict Minerals consist of columbite-tantalite (coltan), cassiterite (tin), gold, wolframite (tungsten), or their derivatives, or any other mineral or their derivatives, as determined by the Secretary of State. ETCO is taking appropriate measures to confirm that the metals used in its products are sourced from “conflict-free” mines. These measures will include the following activities:

- Communicating this policy to ETCO’s suppliers and customers;
- Where possible, requesting that ETCO’s suppliers provide it with certifications regarding the minerals purchased by ETCO;
- Investigating any information ETCO receives from employees, suppliers or other business partners which indicates that any minerals it uses are Conflict Minerals;
- If necessary, terminating relationships with suppliers which ETCO finds have been providing ETCO with Conflict Minerals;
- Establishing the Director of Engineering as Conflict Minerals contact person for enforcing this policy and answering any questions.

John Macaluso
President
ETCO Incorporated