

POLICY ON CONFLICT MINERALS

It is the policy of Lee Spring to avoid the use of conflict minerals originating in the Democratic Republic of Congo and the adjoining countries.

Lee Spring is not a publicly listed company and as such we do not directly fall under the scope of application of the law. Nevertheless, we always try our best to comply with ethnical, social and environmental standards.

To this end, Lee Spring has requested that it's suppliers attest to the fact that they do not knowingly purchase materials from a facility deemed to be such that sources from a black-listed vendor.

According to information available to us, the material for our products do not contain any of the defined "conflict minerals" like coltan, niobium, tantalum, tin, gold or tungsten from the Democratic Republic of Congo or its adjoining countries. If we find any information that suggests otherwise, we will be sure to take remedial action.

FORM-SFT-001 Updated 12/31/12