



Conflict-Free Minerals Policy Statement

Responsible sourcing and funding

In support of global responsible sourcing, MSP Aviation is committed to ensuring that conflict minerals used in the manufacture of its products do not directly or indirectly fund violence or human rights abuses in the Democratic Republic of the Congo or adjoining countries.

In July 2010, The United States passed the Dodd-Frank Financial Reform and Consumer Protection Act (Dodd-Frank). On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) under Section 1502 of this bill, approved the final rule that all U.S. stock listed companies and their suppliers are required to disclose the usage of Conflict Minerals (3TG). MSP Aviation fully supports the actions of governments and organizations in efforts to increase supply-chain transparency and enable companies to obtain conflict-free minerals from environmentally and socially responsible sources. Conflict minerals regulated by the Dodd-Frank Act Section 1502 include columbite-tantalite, also known as coltan (and its derivative tantalum); cassiterite (and its derivative tin); wolframite (and its derivative tungsten); and gold.

MSP Aviation is a privately owned company and a small business entity and therefore is not required by Dodd-Frank to file this information with the SEC. MSP Aviation does not directly source 3TG from mines, smelters, or refiners, and is several steps removed from these market participants.

MSP Aviation has a process in place to obtain information from its current suppliers as to the origins of 3TG metals used in the manufacturing of MSP Aviation products. MSP Aviation expects suppliers to have a policy in place and implement a system to trace the origin of tin, tantalum, tungsten, and gold supplied to the Company, following the template developed by the Responsible Minerals Initiative. Suppliers are encouraged to report any ethical concerns or policy violations.

MSP Aviation has mechanisms for employees, suppliers, and other interested parties to report violations of our Conflict Minerals Policy. The global compliance hotline number is 1-877-217-6328 and the Conflict Minerals inquiry email address is: quality@msp-aviation.com.

MSP Aviation relies on information provided to us by our suppliers regarding the source of their metals. MSP Aviation expects all our suppliers to provide MSP Aviation with 3TG metals sourced from conflict-free areas and where applicable, to be in full compliance with the Dodd-Frank regulations and to provide all necessary declarations. These regulations must also be met by any companies within the overall supply chain of our suppliers. Based on information provided to us by our suppliers, MSP Aviation has not and will not knowingly supply its customers with products containing conflict minerals from the DRC and adjoining countries. MSP Aviation will continue to survey our suppliers to insure they are in full compliance with this policy.