



Guardian Industries Corp.'s Position Statement on Responsible Sourcing

Guardian is committed to sourcing in a socially responsible manner and avoids knowingly using goods, services or raw materials such as tin, tungsten, tantalum or gold (“3TGs” or “Conflict Minerals”) that support or fund inhumane treatment, including human trafficking, slavery, forced labor, child labor, torture and war crimes. Accordingly, Guardian expects all suppliers in its supply chain to meet the expectations set forth below:

- **Supply “DRC Conflict Free” Materials.** Guardian’s suppliers are expected to supply materials that are “DRC Conflict Free”. DRC Conflict Free materials are materials that do not contain any 3TGs that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries. For the avoidance of doubt, any 3TGs from recycled or scrap sources are considered “DRC Conflict Free”.
- **Determine the Origin of any 3TGs.** Guardian’s direct suppliers are expected to pass the then-current Conflict Minerals Reporting Template (CMRT) to their suppliers, who must in turn pass it along to their suppliers for completion, until the smelters/refiners of any 3TGs are identified. The survey information must then be passed back down through the levels of the supply chain to Guardian’s direct supplier, who must complete the CMRT provided by Guardian. Guardian’s suppliers are also expected to provide an update of such survey information on an annual basis, as well as any time the sourcing status of any goods they supply changes.
- **Adopt a Position Statement or Policy regarding Responsible Sourcing.** Suppliers to Guardian are expected to adopt a position statement or policy regarding responsible sourcing consistent with Guardian’s policy statement, implement management systems to support compliance with their position statement or policy, educate their supply base regarding Conflict Minerals, and require their suppliers to take the same steps. More information regarding the U.S. Conflict Minerals Rule can be found at <http://www.sec.gov/divisions/corpfin/guidance/conflictminerals-faq.htm>.