



Conflict Minerals Policy

The Securities and Exchange Commission (“SEC”) adopted annual disclosure requirements in connection with the conflict minerals provision of the Dodd-Frank Wall Street Reform and Consumer Protection Act, requiring publicly traded companies to disclose whether certain minerals necessary to the functionality or production of products manufactured or contracted to be manufactured originated in the Democratic Republic of Congo and its nine neighboring countries (the “DRC”). These certain minerals referred to as “conflict minerals” include tantalum (columbite-tantalite), tin (cassiterite), tungsten (wolframite) and gold (“3TGs”).

Pace is committed to complying with all the conflict mineral requirements under the Act as issued by the SEC.

Pace Industries (“Pace”) supports the humanitarian goal of ending the violence and human rights violations in the DRC, which are believed to have been partially financed by the exploitation and trade of conflict minerals. Pace strives to have a conflict free supply chain and is committed to working with its suppliers to increase transparency regarding the origin of minerals contained in its products. Pace requires its suppliers to undertake reasonable due diligence with their suppliers to identify whether any of the products supplied to Pace contain 3TGs sourced from the DRC and, if so, whether the mines and smelters identified are certified as “conflict free” by an independent third party.

A handwritten signature in blue ink, appearing to read 'Hal Grant', is positioned above the typed name.

Hal Grant, REP, CHMM
Corporate Director
Technical & Regulatory Affairs