**Conflict Minerals Policy**

In August 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). These rules require all United States publicly traded companies to determine if the parts / assemblies in their products contain columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten (known as “Conflict Minerals” or “3TG”). If Conflict Minerals are included in products that are manufactured or contracted to be manufactured, the company must conduct a reasonable inquiry to determine if such Conflict Minerals originated in the Democratic Republic of the Congo (DRC) or any adjoining countries. As a result, Sears is requiring its suppliers to provide sourcing information to the best of their abilities including the smelters and refiners of Conflict Minerals in their supply chain. This will help to determine whether the materials found in their products originated from the DRC or any adjoining country.

Suppliers are expected to maintain their own Conflict Minerals Policy and due diligence.

In effort to identify and reduce Conflict Minerals from the DRC in Sears’ supply chain suppliers may be requested to provide Sears with the one of the following:

* Conflict Minerals Status Questionnaire Template (https://www.searsseating.com/pdf/Conflict-Minerals-Status-Questionnaire.pdf) to determine the need to submit a CMRT.

or

* submit a CMRT([www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/](http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/))

These documents should be sent to Sears.CM@TetraTech.com

We know there will be questions about this process, and we are committed to helping you understand this reporting requirement. If you have any questions about this process you can contact Tetra Tech (Sears.CM@TetraTech.com).

Thank you for your help in this matter.

Eric Behymer

Director of Quality

Sears Seating

(563) 328-2684