

E. GLUCK CORPORATION CONFLICT MINERALS POLICY

E. Gluck Corporation is committed to developing, carrying out and promoting a policy that prohibits the use of “conflict minerals” (*) mined in the Democratic Republic of the Congo (“DRC”) and the adjoining countries (“covered countries”) named in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protections Act (“The Act”), which aims to prevent the use of certain minerals that directly or indirectly finance or benefit armed groups in the DRC and covered countries.

E. Gluck Corporation recognizes that the extraction, trade, handling and export of conflict minerals from the DRC and adjoining countries supports the financing of individuals and organizations engaged in human rights violations and/or injustices. E. Gluck Corporation has no intention of taking part in any actions or activities that violate human rights or contribute to injustice. Therefore, E. Gluck Corporation does not directly purchase any raw conflict minerals for products that it sells, and E. Gluck Corporation will not do business with any supplier that directly or indirectly extracts, trades, handles or imports conflict minerals.

E. Gluck Corporation has officers and executives of the company in place to implement this conflict minerals policy, and E. Gluck Corporation reserves the right to request from any supplier at any time such information, certifications and documentation as it shall deem necessary to monitor or assess compliance with this policy.

*Conflict minerals include Gold; Cassiterite, the metal ore from which Tin is extracted; Columbite-Tantalite also known as Coltan, the metal ore from which Tantalum is extracted; Wolframite, the metal ore from which Tungsten is extracted; or each of their derivatives.; and any other mineral or derivatives determined by the United States Secretary of State to be financing conflict in the DRC or a covered country.

Mark Odenheimer
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E. Gluck Corporation
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