Conflict Minerals Statement

Panduit is a privately held company that is committed to the needs of its customers to comply with the objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 on the use of "conflict minerals" as well as other global requirements that address conflict minerals in the supply chain.

Commitment to Customers and ethical behavior

Panduit is committed to acting in a socially and environmentally responsible manner, to comply with the law(s), to meet its customer commitments, and to support its customers' business. Panduit will not knowingly procure metals that originate from facilities in the Democratic Republic of Congo (DRC) or adjoining countries (collectively, "Covered Countries"). We ask our suppliers to undertake reasonable due diligence with their supply chain to assure that covered conflict minerals are sourced only from mines and smelters outside the Covered Countries or from mines and smelters which have been certified by an independent third-party as conflict free.

Panduit does not import the listed conflict minerals directly, but they may be contained within other products we sell.

- gold;
- tin;
- tungsten, and;
- tantalum

We perform due diligence with our suppliers in the following ways:

- Conduct a reasonable country of origin inquiry to ensure that no minerals are sourced from regions of conflict.
- Educate the manufacturers of the products we purchase about conflict minerals, we do this through our Supplier Code of Conduct.
- Help our suppliers understand the due diligence steps they can take to investigate the source of conflict minerals in the products they produce on our behalf, including those from adjoining countries.
- Consider social audits and accreditation of smelters, mining facilities and/or manufacturers involved in the process of "conflict minerals".

- Monitor suppliers for risk of conflict minerals and other forms of forced and child labor concerns.
- If conflict minerals are discovered in the supply chain, we will take appropriate action to transition product to be “conflict free” and free from all forms of forced labor.

Panduit will disclose discovered “conflict mineral” to effected customers to satisfying any legal or regulatory requirements our customers may have.