



## **Conflict Minerals Policy**

### **Global Power Equipment Group Inc. Conflict Minerals Policy**

#### **BACKGROUND**

On August 22, 2012, the final rule regarding conflict minerals under Section 1502 of the Dodd- Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") was approved by the U.S. Securities and Exchange Commission ("SEC"). The rule requires publicly traded companies to disclose whether the products they manufacture or contract to manufacture contain "conflict minerals" (gold, columbite-tantalite, also known as coltan, cassiterite, wolframite, or their derivatives, tantalum, tin and tungsten) that have been mined or smelted in the Democratic Republic of the Congo (the "DRC") or an adjoining country (Republic of Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda or Zambia) and are "necessary to the functionality or production" of those products. The goal is to reduce funding of armed groups in the region that engage in conflict and human rights abuses.

#### **OUR COMMITMENT**

Global Power Equipment Group Inc. ("Global Power") does not source conflict minerals directly. Nevertheless, Global Power is committed to responsible sourcing within our supply chain of conflict minerals so as to mitigate the risk of directly or indirectly financing or benefitting armed groups in the DRC or an adjoining country and, therefore, we engage in comprehensive due diligence of our supply chain to determine the use, source and origin of conflict minerals, and have in place policies and management processes to support our ongoing commitment to responsible sourcing. In the event we determine that parts supplied to Global Power contain or likely contain conflict minerals that directly or indirectly finance or benefit armed groups in the relevant countries, we will strive to transition such supplies to those suppliers that do not utilize such conflict minerals and who support responsible sourcing in the region.

#### **"CONFLICT MINERALS" POLICY**

Global Power Equipment Group Inc. expects its suppliers to commit to responsible sourcing of minerals. Thus, suppliers are expected to adopt policies and management systems and require their suppliers to adopt similar policies and systems to reasonably assure that the gold, columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives, tantalum, tin and tungsten in the products they manufacture are DRC "conflict free"; meaning any "conflict minerals" necessary to the functionality or production of supplied materials do not directly or indirectly finance armed groups through mining or mineral trading in the DRC or an adjoin country.

Global Power will survey direct suppliers as a part of our conflict minerals due diligence program. Suppliers are expected to respond to survey requests in a timely manner, and with full disclosure, following the specific instructions provided.