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Array Solders Conflict Minerals Policy & Declaration

The goal of this Policy is to set forth the position of Array Solders, LLC. regarding Conflict Minerals (as defined below). This policy also sets forth Array Solders' expectations of suppliers that provide materials or products containing Conflict Minerals that (1) are included in a bill of materials or component materials specification for a Array Solders product or (2) are otherwise contained in a product Array Solders manufactures or contracts to have manufactured.

Scope

This policy applies to Array Solders, LLC.

Introduction

Array Solders is committed to conducting business with a high degree of integrity and in a responsible manner. Accordingly, we take very seriously Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"). In enacting Section 1502, the U.S. Congress intended to promote supply chain awareness and discourage companies from using "Conflict Minerals," which help finance violent, armed conflict that contributes to human rights abuses in the Democratic Republic of the Congo and adjoining countries¹. We also are committed to complying with our reporting and disclosure obligations to the U.S. Securities and Exchange Commission ("SEC") relating to Conflict Minerals as mandated by Section 1502 of the Dodd-Frank Act.

Background Regarding Conflict Minerals Legislation

Section 1502 of the Dodd-Frank Act and the SEC's implementing regulations require Array Solders to determine whether tin, tantalum, tungsten or gold, the "Conflict Minerals" covered by the law, are (i) contained in the products we manufacture or contract to manufacture and (ii) are necessary to the functionality or production of these products. We have determined that many products we manufacture contain one or more of these necessary metals. As a result, we must work with our suppliers to make a reasonable determination whether the Conflict Minerals contained in our products originated from the Democratic Republic of the Congo or an adjoining country

(a “Covered Country”), originated from another region of the world, or are from recycled or scrap sources. Depending on the results of this inquiry, we may need to perform additional due diligence on our suppliers to determine whether the sale of the Conflict Minerals used in our products directly or indirectly financed or benefited armed groups in a Covered Country. The goal of this due diligence would be to identify the smelter or refiner used to process the Conflict Minerals, the country of origin of the Conflict Minerals, and (with the greatest possible specificity) the mine where the Conflict Minerals came from in order to confirm that the Conflict Minerals were not sourced in a manner that financed or benefited armed groups in the Covered Countries.

Our Approach on Conflict Minerals

Array Solders is committed to working with quality suppliers that share our commitment to integrity and responsibility and that engage in responsible sourcing practices. Our overall approach is to establish relationships with our suppliers and work with our suppliers to drive improvements in the materials and products supplied to us.

As part of our Conflict Minerals compliance practices, we educate our suppliers on the requirements of the U.S. law relating to Conflict Minerals and this Conflict Minerals Policy. We survey suppliers in our supply chain about the origin or source of the Conflict Minerals used in the materials and products that they provide to us and the status of their Conflict Minerals due diligence efforts. As part of responding to identified risks in our supply chains, we engage with our suppliers regarding their use of Conflict Minerals and their efforts to ensure that their use of Conflict Minerals does not contribute to conflict and human rights abuses in the Covered Countries. If we identify a reasonable risk that a supplier is violating the commitments set forth in this Conflict Minerals Policy or our Supplier Quality Manual, we will engage with this supplier to implement a corrective action plan.

Supplier Requirements

In general, we expect our suppliers to comply with applicable laws, to avoid corruption, extortion and bribery, not to engage in forced or involuntary labor practices, to promote environmental responsibility and not to be complicit in human rights violations. These principles of conduct are set forth in our Watts Water Code of Business Conduct and in our Supplier Quality Manual. We also expect our suppliers to agree to comply with these standards of supplier conduct.

Pursuant to this Conflict Minerals Policy, we require our suppliers to do the following:

- Cooperate with our information and documentation requests concerning the presence and origin of Conflict Minerals in the materials or products they supply to us and make appropriate inquiries of their suppliers;
- Provide a EICC & GeSI questionnaire
- Exercise due diligence on the source and chain of custody of Conflict Minerals in their supply chains by working with their suppliers to develop an understanding of the origin of these metals or to reasonably confirm that the Conflict Minerals did not originate from a Covered Country or came from recycled or scrap sources; and
- Make these due diligence results available to us upon request.

We reserve the right to request that our suppliers contractually agree to comply with the requirements of this Conflict Minerals Policy. We also reserve the right to request that our suppliers use all commercially reasonable efforts to supply us with materials that are “DRC conflict-free” and certify to such designation whenever possible. Failure of a supplier to comply with the requirements set forth in this Conflict Minerals Policy or implement a corrective action plan may result in Array Solders’ discontinuing its business relationship with such supplier.