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CONFLICT MINERALS POLICY STATEMENT

Hillman, together with its subsidiaries, is committed to corporate responsibility and to respecting human rights in its own operations and in its global supply chain. Hillman is committed to complying with the SEC's Conflict Minerals Disclosure Rule. As part of that commitment, Hillman will seek to identify and reduce the use in its products of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and surrounding countries.