

Conflict Minerals Policy

Box Enclosures, Inc. Company Policy	Date Issued: March 1, 2018	Revision: 3
<i>Conflict Minerals Policy – Rev. 5.01</i>	<i>Form: Box Policy</i>	

Purpose

This document contains Box Enclosures Corporation's policy regarding the use of conflict minerals in its products. As used in this policy "Box Enclosures" includes Box Enclosures Corporation and its subsidiaries. This policy will be reviewed and updated as needed.

Regulatory Overview

There has been increased awareness of violence and human rights violations in connection with the mining of certain minerals from locations in the Democratic Republic of the Congo (the "DRC") and its adjoining countries. In July 2010, President Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. On August 22, 2012, the Securities and Exchange Commission (the "SEC") adopted a conflict minerals rule (the "Conflict Minerals Rule") as mandated by Section 1502 of the Dodd-Frank Act. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the DRC.

To the extent that "conflict minerals" are necessary to the functionality or production of CUSTOM products that Box Enclosures manufactures or contracts to manufacture, we are required to engage in a reasonable country of origin inquiry to determine whether the conflict minerals originated in the DRC or one of the other covered countries under the Conflict Minerals Rule. Additional due diligence and disclosure obligations are triggered to the extent that the conflict minerals are from a covered country or we are unable to determine the source of the conflict minerals.

"Conflict minerals" are defined in the Conflict Minerals Rule as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. In addition to the DRC, the covered countries contemplated by the Conflict Minerals Rule are: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

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Box Enclosures's Policy Statement

Box Enclosures takes its obligations under SEC and other regulations seriously. Box Enclosures also has adopted this policy as part of our efforts to encourage our suppliers to respect human rights and not contribute to conflict. Box Enclosures therefore requires the cooperation of its suppliers in the implementation of this policy and in enabling Box Enclosures to meet its SEC compliance obligations on a timely basis.

Please also see our Code of Conduct for Business Partners, available on the Box Enclosures Corporation website under the Corporate Governance tab.

Supplier Requirements

Suppliers who supply or manufacture components, parts or products containing conflict minerals are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict. Without limiting the foregoing, suppliers are expected to directly and indirectly source conflict minerals only from sources that do not directly or indirectly benefit or finance "armed groups" (as that term is defined in the Conflict Minerals Rule) in the DRC or another covered country.

In furtherance of this policy, our suppliers are expected to:

- implement and communicate to their personnel and suppliers policies that are consistent with this policy;
- put in place procedures for the traceability of conflict minerals at least to the smelter or refiner level, working with their Tier 1 (direct) and Tier 2 (indirect) suppliers as applicable;
- where possible, source conflict minerals from smelters and refiners validated as being conflict free;
- maintain reviewable business records supporting the source of conflict minerals;
- from time to time, at Box Enclosures request, provide to Box Enclosures written certifications and other information concerning the origin of conflict minerals included in products and components supplied to Box Enclosures and the supplier's compliance with this policy generally;
- otherwise establish policies, due diligence frameworks and management systems that are consistent with the Conflict Minerals Rule and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and
- require their Tier 1 (direct) and Tier 2 (indirect) suppliers to adopt policies and procedures that are consistent with those contained herein.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

Box Enclosures 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.

Assessing and Responding to Identified Risks

Box Enclosures believes in establishing and maintaining long-term relationships with suppliers whenever possible. If we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe. Continued failure to adhere to Box Enclosures policies and refusal to address issues of concern may lead to termination of our business relationship with the supplier. Nothing contained in this policy shall be interpreted to preclude Box Enclosures from terminating any supplier relationship at any time for any reason.

Grievance Mechanism and Reporting

Concerns regarding this policy, or violations, can be reported as follows:

Via e-mail to:

sales@boxenclosures.com



By mail to the following address:

Box Enclosures, Inc.

Attn: Legal Department

14092 W. Lambs Lane

Libertyville, IL 60044

Suppliers are encouraged to in the first instance contact their regular sourcing channel if they have any questions concerning this policy.