



## **Conflict Minerals Policy**

In August 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules implementing Section 1502 of the Dodd- Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). Under these rules, publicly-traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain “conflict minerals” originating from the Democratic Republic of the Congo (the “DRC”) or adjoining countries.

Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations. The term "conflict minerals" has been interpreted to refer to tantalum, tin, tungsten and gold (3TG).

While Hayes Performance Systems is not a publicly-traded company, many of its customers are publicly traded. Accordingly, Hayes Performance Systems supports industry-wide efforts to identify, reduce and hopefully eliminate the use of conflict minerals originating from the Democratic Republic of the Congo (“DRC”) and adjoining countries that are financing or benefiting groups committing human rights violations. In furtherance of this goal, Hayes Performance Systems leverages the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT) to gather and exchange supply chain information concerning the origin of 3TG.

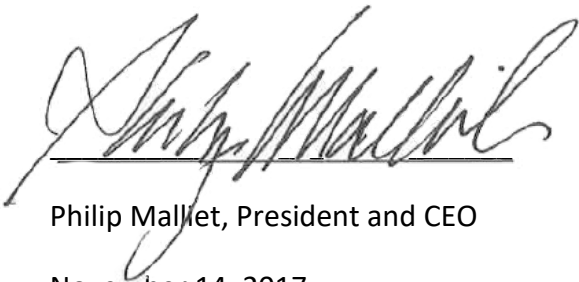
Hayes Performance Systems is also tracking emerging laws and industry practices concerning changing conflict minerals requirements. In furtherance of this effort, Hayes Performance Systems has implemented a due-diligence process that align to the Organization for Economic Co-operation and Development Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). As emerging global requirements become necessary, Hayes Performance Systems will evaluate its program and take efforts to support our customers to meet their obligations under the legislation.

Suppliers to Hayes Performance Systems are expected to establish their own conflict minerals policies, due diligence frameworks and management systems that align with RMI and

OECD Guidance. Suppliers' programs should be designed to prevent illicitly sourced conflict minerals from being included in the products sold to Hayes Performance Systems. In the event Hayes Performance Systems determines that a supplier has failed to develop and implement reasonable steps to comply with this policy, the company reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.

Hayes Performance Systems will continue to regularly survey its suppliers to verify compliance with this Policy.

Hayes is committed to ethical practices and compliance with applicable laws and regulations wherever it does business.

A handwritten signature in black ink, appearing to read "Philip Mallet", is written over a horizontal line. The signature is fluid and cursive.

Philip Mallet, President and CEO

November 14, 2017