

## **Certificate of Non-Use of Conflict Minerals**

## To Our Valued Customers Worldwide,

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) approved the "final rule" sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Under this rule, publicly traded companies must report to the SEC the presence of conflict minerals originating in the Democratic Republic of the Congo (DRC) or adjoining countries (Angola, Burundi, Central Africa Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) in the products they manufacture or contract to manufacture if the conflict minerals are necessary to the functionality or production of a product. These reports must be filed annually by May 31st beginning in 2014.

Although the Zoeller Corporation is privately held, it has initiated a comprehensive process to meet these regulatory obligations, taking steps to increase our supply chain due diligence measures and internal controls for the covered minerals. Based on a Guarantee of Non-use of Conflict Minerals obtained from our material suppliers, we hereby declare that, to the best of our knowledge, the products in which we supply have been manufactured in compliance with Section 1502 of the Dodd-Frank Act, the Conflict Minerals Rule, And furthermore, the Zoeller Corporation promises to only source material from environmentally and socially responsible suppliers.

- 1. Guarantee of Non-Use of Conflict Minerals.
- 2. Requesting that our suppliers report immediately if there are any conflict minerals used in supplied material.
- 3. Requesting that our suppliers undertake commercially reasonable due diligence with their supply chain to assure that minerals used in supplied materials are not sourced from mines in conflict areas

At Zoeller, we expect our suppliers to conduct their operations in a manner that does not result in labor or human rights violations such as the direct financing of armed conflict in its role as a responsible corporate citizen.

**Tim Moss** 

**Purchasing Manager** 

Ouality - Service - Innovation - Integrity