Supplier Social Responsibility

D.B. Roberts is aware of and concerned that mining operations, specifically in the eastern region of the Democratic Republic of the Congo (and adjoining countries) have been determined to be funding “armed militias” directly responsible for widespread human rights violations. As a result, in July of 2010 new legislation was passed requiring companies listed on the U.S. Stock exchange to report annually to the Securities and Exchange Commission (SEC) a list of any products that were produced with minerals sourced from this area of concern as well as disclose any measures taken to eliminate these co-called “conflict minerals” (specifically: tantalum, tin, gold and tungsten) from their supply chain.

D.B. Roberts takes very seriously its responsibility to ensure that metals mined in the Democratic Republic of the Congo do not find their way into our supply chain. Accordingly, as part of the vendor selection process we have added language to our Vendor Approval Survey that provides notice to each D.B. Roberts supplier of Company expectations regarding our collective social responsibility in this matter. The revised Vendor Approval Survey is being systematically distributed to each of our active vendors.

D.B. Roberts has taken this action as we feel it is incumbent upon each of our vendors to promote and maintain the supply chain integrity that our customers demand by ensuring ongoing compliance with the policy requirements stated within the relative legislation. As such, it is expected of all D.B. Roberts vendors who incorporate metals in products supplied to our customers to trace and map their own supply chain to their smelters, seeking only to source materials from non-conflict regions.

Subsequently, D.B. Roberts has begun requiring that suppliers whose products contain any one of the suspect metals submit this information to us using the standardized EICC/GeSI Conflict Minerals Reporting Template which tracks and documents metals back through the supply chain. D.B. Roberts also supports industry initiatives such as the Conflict Free Smelters (CFS) program to validate responsible and sustainable sources. Additionally, D.B. Roberts expects our vendor-base to take similar measures with their suppliers to ensure alignment throughout the supply chain. Should we become aware of a vendor whose supply chain includes metals from a conflict region source, D.B. Roberts will take appropriate action to remedy the situation expeditiously, including reassessment of supplier relationships.

It is anticipated that D.B. Roberts will have all relevant information needed to meet the reporting requirements of our customers, by the May 31, 2014 reporting deadline by the Dodd-Frank regulations.