SIGNODE INDUSTRIAL GROUP CONFLICT MINERALS STATEMENT

There is an increased awareness of violence and human rights violations in the mining of certain minerals from an area sometimes described as the "Conflict Region", located in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. As a result, the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 directed the U.S. Securities and Exchange Commission ("SEC") to adopt rules to implement disclosure requirements related to these "conflict minerals." As we understand it, these rules apply to manufacturers who file periodic reports with the SEC and who manufacture or contract to manufacture products containing "conflict minerals" that are "necessary to the functionality or production" of those products. Signode Industrial Group is not currently a SEC reporting company.

"Conflict minerals" refers to, among other things, tin, tantalum, tungsten, and gold, which are derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The intent of these requirements in the Dodd-Frank Act as we understand it, is to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which many believe has been partially financed by the exploitation and trade of conflict minerals.

Signode Industrial Group's Policy:

The Signode Industrial Group supports the aims and objectives of the US legislation on the supply of Conflict Minerals.

We do not knowingly procure any tin, tantalum, tungsten or gold that originates from the Conflict Region unless they originate from mines or smelters that are certified as "conflict free." In an attempt to comply with this goal, we ask our material suppliers to undertake good faith due diligence with their supply chains in an effort to determine whether the specified metals are potentially being sourced from:

1. mines and smelters outside the Conflict Region or
2. mines and smelters which have been certified by an independent third party as "conflict free" if sourced within the Conflict Region.

This good faith due diligence includes having our material suppliers provide written documentation as to whether they believe that their products containing other than de minimus amounts of the raw materials tin, tantalum, tungsten, and gold ("3TG") used in the manufacture of our products, originate from outside the Conflict Region or if they originate from within the Conflict Region, that the mines or smelters be certified as "conflict free" by an independent third party.

Based on these reviews, to our knowledge we are not aware that we have products containing 3TG materials originating from within the Conflict Region from non-"conflict free" mines or smelters. If we discover that tin, tantalum, tungsten or gold procured by us is produced in the Conflict Region from facilities that are not certified "conflict free" facilities, we will work in good faith with our supply base to transition the product to be conflict free.

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