



## Conflict Minerals Policy

### Responsible Global Supply Chain Management

Corporate responsibility and respect of human rights are essential for Hirsch, Inc. and its subsidiaries (collectively referred to as “Hirsch”), in all our operations and our global supply chain. Hirsch is committed to the target that its use and sale of “Conflict Minerals” do not contribute to the ongoing conflict in the Democratic Republic of Congo (“DRC”). “Conflict Minerals” are cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, at the moment limited to tantalum, tin, tungsten and gold.

On July 21, 2010 the United States enacted legislation that requires companies which are publicly listed in the US to provide disclosures of the use of Conflict Minerals originating from any “Covered Country” (Sec. 1502 Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”). Covered Countries shall mean DRC or an adjoining country (presently Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia). On August 22, 2012 the US Securities and Exchange Commission issued a final rule to implement the new disclosure requirements (“SEC Final Rule”). In order to satisfy their obligations under the SEC Final Rule, US public companies must obtain assurances from their suppliers, and those suppliers, in turn, must obtain assurances from other entities further down the supply chain.

Hirsch supports the Dodd-Frank Act’s goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. We are committed to responsible sourcing of materials for our products, including the sourcing of Conflict Minerals, and we expect that our suppliers are likewise committed to responsible sourcing. We also support greater transparency with regard to the supply chain, in particular the sourcing of Conflict Minerals. Accordingly, we have adopted this Conflict Minerals Policy, and we expect that our suppliers will adopt a similar policy and meet our expectations set forth below.

We are committed to sourcing products from suppliers that share our values with regard to human rights, ethics, and social and environmental responsibility. Our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting and refining of Conflict Minerals. As a result, we expect that all of our suppliers will partner with us to (i) provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the SEC Final Rule, and (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a manner that results in products and materials that are “DRC Conflict Free”. For purpose of the SEC Final Rule, “DRC Conflict Free” means that the product does not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries. We are committed to working with our suppliers to educate them about these issues and the steps that they can take to increase the transparency of the supply chain and to ensure that products and materials in the supply chain are DRC Conflict Free.

Hirsch expects its suppliers to have in place due diligence measures in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”) or any other nationally or internationally recognized supply chain due diligence standard of equivalent nature ensuring that direct materials, parts, components, sub-assemblies supplied to us are DRC Conflict Free. Based on the foregoing, Hirsch expects that suppliers can reasonably demonstrate that they have exercised due diligence on the source and chain of custody of Conflict Minerals and verify on an ongoing basis – e.g., by participation in established supply chain communication processes such as the “EICC@/GeSI Conflict-Free Smelter Program” or otherwise – that their products are “DRC Conflict Free”.