

 CORPORATE POLICY	CONFLICT MINERALS POLICY	English
	Owner: VP, General Counsel and VP, Operations Department: Corporate Legal and Operations	Last Review: 2014.05.30

POLICY

The Conflict Minerals Policy requires Hubbell to annually analyze the sourcing of any Conflict Minerals from the DRC and its neighboring countries pursuant to the requirements of the Act. Hubbell has established a conflict minerals compliance program that is designed to follow the framework established by the OECD. As Hubbell becomes aware of instances where Conflict Minerals in our supply chain may finance armed groups, Hubbell will work with its suppliers to either identify potential alternate sources or formulate other appropriate responses. Hubbell remains committed to working with its global supply chain to ensure compliance with Section 1502 of the Act.

SCOPE

All of Hubbell's direct material used in the manufacture of its products and those products that Hubbell contracts to manufacture from a third party must be analyzed in accordance with the Act.

PURPOSE

The purpose of this policy is to comply with Section 1502 of the Act regarding Conflict Minerals and related SEC rules and regulations.

DEFINITIONS

Act: The Dodd-Frank Wall Street Reform and Consumer Protection Act.

Conflict Minerals: Columbite-tantalite (coltan) (i.e., tantalum); cassiterite (i.e., tin); gold; and wolframite (i.e., tungsten) or their derivatives that are mined from the DRC and adjoining countries. This collection of materials could expand to include other minerals or their derivatives as determined by the U.S. Secretary of State. The collection of conflict minerals at the inception of the Act are commonly called "3TG".

DRC: Democratic Republic of the Congo.

OECD: Organization for Economic Cooperation and Development

SEC: United States Securities and Exchange Commission.

KEY WORDS

3TG, Conflict Minerals, DRC, Dodd-Frank, and OECD

RELATED DOCUMENTS (Procedures, Guidelines, Standards):

- Conflict Minerals Procedure

Version	Approval	Effective	Changes
1	A. Hsieh, S. Mais, J. Capozzoli	2014.05.30	Original Issue