



# Tesco Corporation

## Conflict Minerals Sourcing Policy

PL-LEGAL-20

Rev 01 8/07/14

### 1. Policy Statement

The culture of Tesco Corporation and its subsidiaries and affiliated entities (“TESCO”) is centered on ethics, integrity and trust. Our values drive how we treat each other, our customers, suppliers, partners and even our competitors. By combining uncompromising character, transparent business behavior, mutual respect, and world-class products and services, we seek to build an enduring culture that creates satisfied customers, engaged employees and sustainable, profitable growth. As a result, our ethical business culture supports global efforts to assist in the eradication of Human Rights abuses in the Democratic Republic of Congo (“DRC”) and adjoining countries, where the mining of certain minerals has partially financed the long standing conflict in this region.

### 2. Background

The U.S. Securities and Exchange Commission (“SEC”) adopted rules to implement reporting and disclosure requirements related to "conflict minerals," as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers (such as TESCO) who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain "Conflict Minerals" (identified below) sourced from "Covered Countries" (identified below) that are necessary to the functionality or production of those products. There is no *de minimis* exception to the application of these requirements – so long as one of the materials is necessary to the functionality of production of a product manufactured by or for a company that company must undertake to make disclosures.

- "Conflict Minerals" currently refer to gold, tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite (also known as “coltan”), and wolframite, regardless of where they are sourced, processed or sold.
- The "Covered Countries" include: Democratic Republic of Congo, Central African Republic, Sudan, Zambia, Angola, Congo Republic, Tanzania, Burundi, Rwanda, and Uganda.

### 3. Commitment

TESCO supports the objectives and intent of this Conflict Minerals legislation and will fulfill any related SEC reporting requirements.

The Company is committed to working toward a “conflict free” supply chain by implementing a management program that is fully integrated with our policies and processes. In this manner, TESCO will ensure its worldwide suppliers are aligned with this policy. Our Conflict Minerals program will be addressed primarily through Terms and Conditions with suppliers and our Purchase Order requirements.

TESCO will not knowingly procure raw Conflict Minerals from Covered Countries that are not deemed “conflict free” from mines, smelters, and refiners that produce the minerals used in our products.

TESCO will perform reasonable due diligence to document that Conflict Minerals used in the materials and components supplied to TESCO are procured from outside the Covered Countries or, if they originate from the Covered Countries, that they are certified as "conflict free".

TESCO is committed to educating our employees and our suppliers to ensure improved visibility in regards to the origin of the minerals and compliance by not knowingly sourcing Conflict Minerals from Covered Countries that are not deemed “conflict free.”

If we discover that the use of any of these Conflict Minerals by TESCO is found to originate from the Covered Countries, specifically from sources that are not deemed "conflict free", we will take immediate actions to transition toward a conflict free status. Given the complexity and variety of our product offering and global supply chain, we understand that this will require an investment in resources and take time, but we are committed to meeting this goal and will be transparent in our progress toward this end. If you would like further information regarding this matter, please email us at [legal@tescocorp.com](mailto:legal@tescocorp.com).