

## The Eastern Company Conflict Minerals Policy

“Conflict Minerals” refer to minerals specifically tantalum, tin, gold, tungsten or their derivatives originating in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”) and could include other minerals and their derivatives as determined by the U.S. Secretary of State. On August 22, 2012, the final rules regarding the sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act was approved by the U.S. Securities and Exchange Commission (the “SEC”). The rule requires annual reporting to the SEC of the presence of any conflict minerals originating from the Covered Countries in the products manufactured or contracted to manufacture whereby the conflict minerals are necessary to the functionality or production of a product. The Eastern Company is committed to taking all necessary steps to comply with this law and will file its first report with the SEC on May 31, 2014 for the calendar year 2013.

Suppliers must pass this requirement through the supply chain and determine the source of specified minerals and provide written evidence of due diligence documenting source of origin of the specified conflict minerals.

Suppliers who are non-compliant to these requirements shall be reviewed by our purchasing managers for future business.

The Eastern Company supports this effort and expects its suppliers to source materials from socially responsible suppliers.

The Eastern Company expects all of its suppliers to comply with the Dodd-Frank legislation (<http://www.sec.gov/rules/final/2012/34-67716.pdf>) and provide all necessary declarations.