



COMPANY POLICY - CONFLICT MINERALS

In 2012, The Securities and Exchange Commission adopted rules implementing Section 1502 of the Dodd-Frank Act (the “Conflict Minerals Rules”) pertaining to Conflict Minerals. The Conflict Minerals Rules require public companies to disclose information annually about whether the products they manufacture or contract to manufacture for which Conflict Minerals are necessary to the functionality of production of those products contain Conflict Minerals that originated in any “Covered Countries,” and, if so, information about the source and chain of custody of those Conflict Minerals.

The term “Conflict Minerals” in this context refers to specific minerals originating from mines controlled by armed group in the Democratic Republic of Congo or adjoining Countries including: DRC, the Republic of Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

The specific minerals are:

- Gold
- Tantalum (columbite-tantalite or coltan)
- Tin (cassiterite)
- Tungsten (wolframite)

Tecumseh Products Company LLC supports these efforts to further the humanitarian goal of ending violent conflict in the Democratic Republic of Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of “Conflict Minerals.”

Tecumseh Products Company LLC is committed to sourcing products from suppliers that share our values with regard to human rights, ethics, and social and environmental responsibility. We expect that all our suppliers will partner with us to:

- Implement and communicate policies that are consistent with this Conflict Minerals Policy, and require that their direct and indirect suppliers do the same;
- Establish procedures and contractual provisions that facilitate the traceability of Conflict Minerals within our supply chain and provide for the sourcing of DRC Conflict Free products and materials under all circumstances;
- Provide us with timely and accurate information, at our request, regarding the source of Conflict Minerals in our supply chain and the steps that have been undertaken to determine whether such products and materials are DRC Conflict Free, including whether the source has been verified by a recognized, independent third party;
- Use reasonable efforts to source Conflict Minerals from smelters and refiners that have been validated by a recognized, independent third party as DRC Conflict Free; and
- Advise us as promptly as possible of any determination that any products or materials in the supply chain are not DRC Conflict Free

Failure to comply with Tecumseh’s Conflict Free sourcing policy may result in the termination of our relationship with a supplier, as permitted by applicable law.