



April 22, 2013

## **Dodd-Frank Conflict-Free Minerals Legislation**

On August 22, 2012, the US Securities and Exchange Commission (the "SEC") released final rules relating to Section 1502(b) of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank") that require all public companies to annually disclose and report to the SEC whether any of their products contain minerals (Tin, Tantalum, Tungsten and Gold, so called 3TG or "conflict minerals") that may have originated from mines in the Democratic Republic of Congo or any adjoining country that support armed militias or rebels in the region.

### **POLICY STATEMENT**

Since 1920, Snap-on has focused on serving customers, associates, investors, franchisees, suppliers and the communities where it does business. Snap-on is guided by its core beliefs and values as stated in Snap-on's "Who We Are" statement, a copy of which can be found at (<http://www1.snapon.com/corporate/valuesbeliefs.nws>). Snap-on believes that its commitment to integrity, human rights and social responsibility extends to its worldwide supply base.

Snap-on is committed to sourcing its products responsibly, and it expects its suppliers to source materials from socially responsible suppliers. As a result, Snap-on has designed its conflict minerals reporting efforts to align and comply with Dodd-Frank's conflict minerals reporting rules.

Accordingly, Snap-on will comply with all conflict minerals reporting rules and other applicable laws. In so doing, Snap-on will:

- (i) Require that all of its suppliers (who provide products or components to Snap-on that contain conflict minerals) complete annual surveys regarding the country of origin of any conflict minerals contained in such products or components;
- (ii) Require that all suppliers agree to cooperate with Snap-on in connection with any due diligence that Snap-on chooses to perform with respect to its country of origin inquiries; and
- (iii) Require a supplier, when Snap-on deems it necessary, to provide reasonable proof of the due diligence performed by the supplier to support the country of origin certification provided by the supplier to Snap-on.

This policy applies to all products manufactured by, or on behalf of, Snap-on anywhere in the world, including all products or components purchased by Snap-on and included in products Snap-on manufactures and/or sells.