



sparton
Empowering your Vision

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DIVISIONS
MEDICAL
DEFENSE AND SECURITY
NAVIGATION AND EXPLORATION
COMPLEX SYSTEMS

RE: Conflict Minerals Policy Statement

On August 22, 2012, the Securities and Exchange Commission (“SEC”) published the final regulations implementing the conflict minerals reporting obligations of Section 1502 of the U.S. Dodd-Frank Wall Street Reform Act (the “Act”). Section 1502 of the Act requires, in part, SEC registrants whose products contain metals derived from conflict minerals (generally, tantalum, tin, tungsten, and gold), to report annually to the SEC. This reporting requirement was based on concerns that the current humanitarian crisis in the Democratic Republic of Congo and surrounding countries has been financed by profits originating from the mining and transport of conflict minerals.

As a manufacturer and SEC registrant, Sparton Corporation is required to comply with the Act. We support ending the violence in such areas and our position has always been to comply with applicable laws affecting our industry. As such, we are implementing due diligence procedures and working towards meeting the requirements of the Act.

In order to comply with the Act, Sparton is requiring that our suppliers assist in the determination of the source of any potential conflict minerals used in manufacturing. Our suppliers will need to comply with Sparton’s conflict minerals due diligence practices and policies, so that we can provide the required disclosures to the SEC.

Steve Korwin

Senior VP, Quality & Engineering
Sparton Corporation