



Cleveland Gear Company, Inc.

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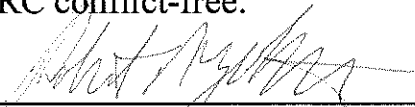
January 1, 2020

**CLEVELAND GEAR COMPANY, INC.
CONFLICT METALS STATEMENT**

In response to customer inquiries regarding compliance with Section 1502 of the Dodd-Frank Act relating to conflict metals originating from the Democratic Republic of Congo (DRC) and neighboring countries, Cleveland Gear Company, Inc. has prepared this statement. The scope of this statement is limited to minerals currently defined as Tin, Tantalum, Tungsten, and Gold; also referred to as “3TG minerals”.

Cleveland Gear Company, Inc. has contacted our direct suppliers of raw materials which contain tin and certifies to the best of our knowledge that our supply chain does not contain any minerals or materials originating from the Democratic Republic of Congo or adjoining countries. Gold, Tantalum, and Tungsten are not present in the materials used in the manufacture of our products.

As a privately-held company, we are not subject to the SEC disclosure requirement of the Dodd-Frank Act; however, to support our customers worldwide and our corporate commitment to ethical practices and compliance with all applicable laws and regulations, we are committed to ensuring that our metals suppliers are DRC conflict-free.



Robert A. Wightman
Vice President of Finance