



STATEMENT OF PRINCIPLES

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Conflict Minerals

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act governing conflict minerals. Conflict minerals include tin, tungsten, tantalum, and gold (also referred to collectively as “3TG Minerals”) originating from the Democratic Republic of Congo or countries in that region. Publicly traded companies subject to Section 1502 must perform a reasonable “country of origin” due diligence inquiry on 3TG Minerals used in their supply chains and adhere to certain reporting obligations to the SEC. More information about Section 1502 can be found at: www.sec.gov/rules/final/2012/34-67716.pdf

Wurms Diversified Solutions is not subject to the SEC regulations on conflict minerals. Nevertheless, consistent with our sense of corporate responsibility and in keeping with our company policies, including our Supplier Code of Conduct, we seek to conduct our business in a manner that is consistent with the intention of Section 1502 and to assist our customers who may have Section 1502 obligations. To that end, we want to assure our customers of the following:

- We do not knowingly purchase or knowingly use conflict minerals in our products. We do not source any 3TG Minerals directly from mines, smelters, or refiners and we are several levels removed from the direct market vendors of those materials.
- We undertake a due diligence process whereby we use the information we have about the material composition of our products to identify components or materials that could potentially contain metals extracted from 3TG Minerals. We then identify the suppliers of those components or materials and seek information from them to determine if the material composition of the products we are purchasing from them includes 3TG Minerals.
- Having taken these steps, we can represent that, to the best of our knowledge, the components of the parts we purchase are free of conflict minerals. This conclusion is based on a demonstration by suppliers, as required by our Supplier Code of Conduct, that they (1) have in place reasonable conflict minerals due diligence procedures for their suppliers and supply chain and (2) in their ongoing due diligence procedures, they have not identified any conflict minerals violations or suspected violations.
- We constantly monitor the compliance status of suppliers’ products on a component level to ensure the greatest level of accuracy of the information we are relying upon. In the event we were to be told or independently discover that a supplier to us is not providing us with conflict-free materials or components, we would immediately stop doing business with that supplier and find an alternative conflict-free supply source for that material or component.

Child Labor, Forced Labor and Modern Slavery

Wurms Diversified Solutions (WDS) acknowledges the disconcerting fact that child labor, forced labor and modern slavery are significant societal problems in many parts of the world. We are committed to playing a positive role in helping society eliminate exploitative child labor, forced labor and modern slavery. As a global employer and purchaser of service and goods, WDS has an important role to play in these issues. We cannot solve this problem alone, however by working with others, we believe we can make a difference. To this end, WDS has adopted these Principles for the company and its other associated entities. Our Principles include an explicit ban on the exploitation of children, their engagement in unacceptably hazardous work, and the physical punishment, abuse, or involuntary servitude of any worker.

WDS reaffirms continued worldwide commitment to restrict employment to those age 16 or older, unless the local minimum employment age, or the mandatory school age, is higher. It is the responsibility of local management and each supplier to verify the age of an applicant for any particular type of employment using commonly accepted proofs of age.

Hazardous work includes activities which expose children to the possibility of physical, psychological or sexual abuse; work underground, under water, at dangerous heights or in confined spaces; work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; work in an unhealthy environment which may, for example, expose them to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; and work under particularly difficult conditions such as work for long hours or during the night or work where they are unreasonably confined to the premises of the employer.

Forced Labor and/or Slavery is any and all work or service which is exacted from any person under the menace of any penalty for its non-performance and for which the worker does not offer themselves voluntarily. WDS strictly prohibits the use of forced labor, slavery, and human trafficking across all its operations and facilities. We do not tolerate the exploitation of children, nor do we tolerate the trafficking, physical punishment, abuse, or involuntary servitude of any person. We do not tolerate the confiscation or withholding of any form of identity documents including work permits, immigration documents, travel documents or passports.

Furthermore, WDS prohibits practices involving the recruitment, transportation, transfer, harboring, or receipt of individuals through coercion, fraud, or deception with the intent to exploit them for profit, in any manner. We are committed to creating a safe and respectful work environment for all. Any violations of these principles are taken seriously, and immediate corrective actions are taken to address and rectify such issues.

We communicate these Principles to our suppliers and we include in our agreements to meet these requirements as an ongoing condition of our business relationship. We assure that we and our business partners do not engage in human trafficking by conducting and requiring appropriate background checks and individual documentation in our hiring processes and the hiring processes of our suppliers. We strongly believe we have the responsibility to engage in employment practices that meet the highest ethical and legal standards. Nowhere is this responsibility more important than in the company's policies governing the minimum age and working conditions of its own employees and the employees of our suppliers, vendors, contractors, and subcontractors. We believe that promoting fair and appropriate employment at our facilities and within our supply chains is a critical part of the commitments we make to our people and our communities.

We do not work with recruiters; however we recognize that our suppliers, vendors, contractors and subcontractors may do so. We do not tolerate charging workers or potential workers recruitment fees, as this responsibility shall belong to the organization. Furthermore, we prohibit practices involving the recruitment, transportation, transfer,

harboring, or receipt of individuals through coercion, fraud, or deception with the intent to exploit them for profit, in any manner. We are committed to ethical recruitment practices complying with all laws and regulations around recruiting in the jurisdiction in which they operate, creating a safe and respectful work environment for all. Any violations of these principles are taken seriously, and immediate corrective actions are taken to address and rectify such issues.

WDS has developed this Statement of Principles on Child Labor, Forced Labor and Modern Slavery as an expression of our own commitment and the expectations we have for our suppliers, vendors, contractors, and subcontractors. This commitment also extends to the use of any factory or sub-vendors who make or assemble our products. WDS will not tolerate the use of unlawful child labor or forced labor/slavery in the manufacture of our products and together, we require that all of our Suppliers of any product or raw material, wherever it originates, apply our Child Labor, Forced Labor and Modern Slavery Principles. WDS will not accept products or services from our Suppliers that employ or utilize child labor or forced labor/slavery in any manner. In addition, we strongly encourage our Suppliers to require their own suppliers to adhere to these principles as well.

WDS will continuously seek to make these Principles as relevant and effective as possible. To that end, we may amend these Principles from time to time.