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Conflict Minerals Policy Statement

“Conflict Minerals” refers to certain minerals and their derivatives mined in the eastern province of the Democratic Republic of the Congo (“DRC”) and in the adjoining countries (“DRC Region”) where the revenues generated by their sale may be directly or indirectly financing armed groups engaged in civil war resulting serious social and environmental abuses.

We support ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”. NWL fully supports the efforts to eliminate the use of tantalum, tin, gold and tungsten from improper sources that could promote abuses in the DRC Region. NWL does not directly source these materials from the smelters or mines but uses refined metals in manufacturing of our products. Therefore, we rely on the information provided by our suppliers regarding their sourcing of metals. NWL anticipates that its suppliers will source materials from socially responsible suppliers and that all of its suppliers will comply with Dodd-Frank regulation¹ and provide all necessary declarations as requested.

OUR COMMITMENT:

- NWL is committed to ethical practices and compliance with applicable laws and regulations wherever it does business.
- Based on information currently provided by our suppliers, NWL does not knowingly use “Conflict Materials” in any of our products.
- NWL does not knowingly procure specified metals that originate from facilities in the “Conflict Region” that are not certified as “conflict free”.
- We will ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from mines and smelters outside the “Conflict Region” or mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”.

NWL will perform our due diligence and regularly survey our suppliers to verify compliance with this policy. This will include having our suppliers provide written evidence documenting that raw materials used to produce products supplied to NWL, originate from outside the “Conflict Region”.

Respectfully,

William Bachrach
Vice President Operations

¹ July 2010, the U.S. Government signed the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”). Section 1502 of the Dodd-Frank Act requires all US publicly traded companies to file disclosures and reports with the U.S. Securities and Exchange Commission related to the use of conflict materials (tin, tantalum, tungsten and gold) in their products.