



**Certificate of Compliance
Conflict Minerals Declaration**

March 21, 2018

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “Conflict Minerals”, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture, or contract to manufacture, contain “Conflict Minerals necessary to the functionality or production” of those products that directly, or indirectly, finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. The term “Conflict Minerals” is defined as tin, tantalum, tungsten, gold and their derivatives.

The Lee Company, as a privately held corporation, is not subject to the Conflict Minerals reporting requirements directly; however, as a supplier to publicly traded companies, we are committed to helping our customers comply with their reporting requirements. In this regard, we have conducted a “Reasonable Country of Origin” inquiry process, as necessary, with our relevant suppliers. Based upon the information obtained in that inquiry process and, to the best of our knowledge and belief, the products that we have supplied to you do not contain Conflict Minerals, as defined above.



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