

The National Chain Group

U.S.A. – Dodd-Frank Act Compliance Policy Statement

In 2010, a new law was enacted, the Dodd-Frank Wall Street Reform and Consumer Protection Act. Within the Act, there is a provision regarding so-called “Conflict Mineral” (Tin, Tungsten, Tantalum and Gold) requiring U.S. based public companies to disclose measures they have taken to identify these metals within their supply chains and to demonstrate that they have not been sourced either directly or indirectly from the Democratic Republic of Congo (DRC) and adjoining nations. Due to the fact that many jewelry retailers, wholesalers and manufacturers are either public companies or have become owned by public companies, these firms are pressing for such compliance down throughout their supply chain. Therefore as a supplier to such entities, it is now the policy of the Dodd-Frank Act and require our complete supply chain to assure compliance as well for any products and materials supplied to our group.

National Chain Group: There are many divisions within our group. This Compliance Policy is relevant to all the members of our group including but not limited to: National Chain, Wiesner Manufacturing, Volk Manufacturing, Apogee Precision Parts, James A. Murphy and Son, and Standard Chain as these particular entities are the main sales divisions of our group.

It is our policy that we do not use any metals in our products which come from conflict areas as outlined in the Dodd-Frank Act. We are able to trace the source of our materials from our suppliers and only use those who are in compliance with this Act and can provide evidence of compliance.