
The Conflict Minerals Disclosure Rule

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) adopted a final rule (the "Rule") under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") requiring publicly traded companies subject to Securities Exchange Act of 1934 reporting requirements, to report annually on the use and source of "Conflict Minerals" in their products. Conflict Minerals are defined in the Rule as Gold, as well as Tin, Tantalum and Tungsten (known as the "3TGs" and their derivatives Cassiterite, Columbite-Tantalite and Wolframite), which originate in the Democratic Republic of Congo, or an adjoining country specified in the Rule (collectively the "Covered Countries"). The Rule was implemented to increase supply chain transparency with the aim of ending ongoing violent conflict driving human rights violations in the Covered Countries that the U.S. Congress determined is being partially financed by revenues generated from the mining and transport of Conflict Minerals.

Conflict Minerals Policy Statement

The Whitney Blake Company is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Whitney Blake seeks to source products, components and materials from companies that share our values, ethics, and environmental responsibility. Thus Whitney Blake is committed to avoiding the procurement of products or components that contain Conflict Minerals.

Furthermore, we recognize that the procurement of other minerals, including cobalt, may be subject to the same conditions as 3TGs.

While Whitney Blake is not a public company listed on a United States stock exchange, Whitney Blake does support the SEC's Rule and the OECD's Responsible Minerals Due Diligence Guidance. We participate in industry-wide efforts to identify, reduce and hopefully eliminate the use of Conflict Minerals originating from the Covered Countries.

Whitney Blake sources from numerous suppliers, and a number of our suppliers and their suppliers are private companies or international companies that are not subject to SEC regulations. Whitney Blake must therefore rely on the cooperation of its suppliers in the implementation of this policy.

Suppliers to the Whitney Blake Company are expected to establish their own Conflict Minerals policies, due diligence efforts and management systems to prevent Conflict Minerals from being included in the products sold to Whitney Blake. Whitney Blake will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy and will reconsider our willingness to partner with any supplier that fails to comply with this policy.

Respectfully,

Sheldon P. Scott
President / CEO
Whitney Blake Company



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