



An initiative of the EICC and GeSI

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Conflict Minerals Reporting Template (CMRT)

English

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Revision 4.10
April 29, 2016

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*).

Company Information

Company Name (*):	Peterson American Spring
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	21200 Telegraph Road, Southfield, MI 48033
Contact Name (*):	Tim Demske
Email - Contact (*):	conflict.minerals@pspring.com
Phone - Contact (*):	248-799-5400
Authorizer (*):	Tim Demske
Title - Authorizer:	Director of Purchasing
Email - Authorizer (*):	tim.demske@pspring.com
Phone - Authorizer (*):	248-799-5400 Ext. 10239
Effective Date (*):	7-Mar-2016

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is the 3TG intentionally added to your product? (*)	Answer	Comments
Tantalum (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.
Tin (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.
Gold (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.
Tungsten (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.

2) Is the 3TG necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)	Answer	Comments
Tantalum (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.
Tin (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.
Gold (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.
Tungsten (*)	No	Peterson American Spring does not purchase this metal for any of the products that it manufactures or contracts to manufacture.

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

5) Have you received data/information for each 3TG from all relevant suppliers?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

6) Have you identified all of the smelters supplying the 3TG to your supply chain?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		



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7) Has all applicable smelter information received by your company been reported in this declaration?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Do you have a policy in place that addresses conflict minerals sourcing?	Yes	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.)	Yes	http://www.pspring.com/conflict-minerals-policy.pdf
C. Do you require your direct suppliers to be DRC conflict-free?	Yes	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?	No	Peterson American Spring does not purchase products containing conflict minerals for any of the products that it manufactures or contracts to manufacture.
E. Have you implemented due diligence measures for conflict-free sourcing?	Yes	
F. Do you collect conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755 Conflict Minerals Data Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]?	Yes	
G. Do you request smelter names from your suppliers?	No	Peterson American Spring does not purchase products containing conflict minerals for any of the products that it manufactures or contracts to manufacture.
H. Do you review due diligence information received from your suppliers against your company's expectations?	Yes	
I. Does your review process include corrective action management?	Yes	If we identify a reasonable risk that a supplier is violating our commitments set forth in this Policy, we will require them to commit to and implement a corrective action plan within a reasonable timeframe. We will follow-up on the effectiveness of corrective actions and will conduct on-site
J. Are you subject to the SEC Conflict Minerals rule?	No	