



The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 directed the U.S. Securities and Exchange Commission (“SEC”) to develop reporting and disclosure requirements related to “conflict minerals.” The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products. The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten (the derivatives of cassiterite, columbite-tantalite, and wolframite) regardless of where they are sourced, processed or sold.

The purpose of this policy is to state the commitment of Steel Partners Holdings L.P. and its subsidiaries to: (i) not knowingly procure specified metals that originate from facilities in the Conflict Region (defined as the Democratic Republic of the Congo and surrounding countries) that are not certified as “conflict free”; and (ii) comply with its obligations as a public company under the U.S. laws and regulations regarding “conflict minerals.”

Steel Partners Holdings L.P. and its subsidiaries will ensure compliance with these requirements by routinely conducting their due diligence and suppliers will be asked to undertake reasonable due diligence with their supply chains to assure that the 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.

Steel Partners Holdings L.P. will submit an annual filing on Form SD to the SEC on a timely basis.