

 Corporate Policy	CONFLICT MINERALS POLICY
	Owner: Vice President, General Counsel and Vice President, Operations
	Department: Legal and Operations

POLICY

The Conflict Minerals Policy requires Hubbell to annually analyze the sourcing of any Conflict Minerals from the DRC and its neighboring countries pursuant to the requirements of the Act. Hubbell has established a conflict minerals compliance program that is designed to follow the framework established by the OECD. As Hubbell becomes aware of instances where Conflict Minerals in our supply chain may finance armed groups, Hubbell will work with its suppliers to either identify potential alternate sources or formulate other appropriate responses. Hubbell remains committed to working with its global supply chain to ensure compliance with Section 1502 of the Act.

DEFINITIONS

Act: the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Conflict Minerals: columbite-tantalite (coltan) (i.e., tantalum); cassiterite (i.e., tin); gold; and wolframite (i.e., tungsten) or their derivatives that are mined from the DRC and adjoining countries. This collection of materials could expand to include other minerals or their derivatives as determined by the U.S. Secretary of State. The collection of conflict minerals at the inception of the Act are commonly called "3TG".

DRC: Democratic Republic of the Congo.

OECD: Organization for Economic Cooperation and Development

SEC: United States Securities and Exchange Commission.