

Conflict Minerals Policy Statement

May 26, 2015

“Conflict Minerals” refers to certain minerals and their derivatives mined in the eastern province of the Democratic Republic of the Congo (“DRC”) and in the adjoining countries (“DRC Region”) where revenues generated by their sale may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In July 2010, the United States passed the Dodd -Frank Financial Reform Bill. Section 1502 of this bill requires all U.S. stock listed companies and their suppliers to disclose the chain of custody usage of Conflict Minerals (Tin, Tantalum, Tungsten, and Gold).

Tower supports this legislation and supports efforts to eliminate the use of Conflict Minerals.

Tower does not procure Conflict Minerals directly from suppliers. As such, Tower has implemented procedures to ensure that specified metals are only being sourced from mines and smelters outside the “DRC Region” or mines or smelters which have been certified by an independent third party as “conflict free” if sourced within the “DRC Region.” Specifically:

- Suppliers must pass this requirement through their own supply chain and determine the source of specified minerals.
- Tower expects all of its suppliers to provide Conflict Minerals declarations using the EICC/GeSI Conflict Minerals Reporting Template.

Tower will continue to regularly perform due diligence and survey its suppliers to verify compliance with this policy.