



S T E E L P A R T N E R S

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 adopted by the SEC 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 (“SPLP”) to comply with its obligations as a public company under U.S. laws and regulations regarding “conflict minerals.”

SPLP expects its suppliers to support its efforts to identify the origin of “conflict minerals” used in SPLP’s products.

SPLP submits an annual filing on Form SD to the SEC to the extent required by applicable U.S. laws and regulations.