



Financial Policy Manual

Policy Number: 320

Supply Chain

Conflict Minerals

Issue Date: 9/10/13

Approved by: Jim Porter

Policy

The ongoing conflict and extreme violence in the Democratic Republic of Congo (“DRC”) and surrounding regions (collectively, the “DRC Region”) may be directly or indirectly financed by the mining of and trade in “Conflict Minerals” in the DRC Region. The term “Conflict Minerals” refers to tin, tungsten, tantalum and gold (collectively the “3TG Minerals”), and the ores from which they originate. The 3TG Minerals are present in the manufacture of a variety of commercial products, including some of the products fabricated and sold by Apogee and its business units (collectively, the “Company”). Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”) requires publicly traded companies to inquire into the origin of 3TG Minerals in their supply chains and to report on their due diligence processes and findings in filings with the U.S. Securities and Exchange Commission. As a publicly traded company, Apogee is required to comply with the 3TG Minerals provisions of the Dodd-Frank Act. The Company supports the goals of this regulation.

Policy Implementation Standards

The Company will take the following steps to determine the use, source and origin of 3TG Minerals in its global product portfolio across all business units. The Company will use a reasonable documented process to:

- Work closely with suppliers to determine the potential use of 3TG Minerals in the Company’s supply chain and, when appropriate, work with suppliers to remediate issues and source more responsibly.
- Expect suppliers to the Company to conduct the necessary inquiry and, where appropriate, additional due diligence to provide the Company with confirmation of the source of 3TG Minerals used in their processes and ultimately present in materials and/or products supplied to the Company.
- Encourage the suppliers to the Company to advocate and actively action our philosophy of sourcing 3TG Minerals from socially responsible suppliers, which may include conflict-free mines in the DRC Region.

The Company commits to institute systems, procedures and governance processes to ensure proper implementation of this policy across the Company and documentation of its procedures.