



# Delta Apparel, Inc.

## Conflict Minerals Policy April 23, 2014

### Introduction

In 2010, Congress enacted the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act") to address the exploitation and trade of certain minerals that contribute to violence and human rights abuses in the Democratic Republic of the Congo ("DRC") and neighboring countries. The U.S. Securities and Exchange Commission adopted rules implementing the conflict minerals provisions of the Dodd-Frank Act ("Conflict Minerals Rules") in 2012. These rules generally require public companies to annually disclose information regarding whether Conflict Minerals are necessary to the functionality or production of their products, whether Conflict Minerals contained in their products originated in any "Covered Countries," and information about the source and chain of custody of any such Conflict Minerals. "Conflict Minerals" are gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), and may include other designated minerals in the future. "Covered Countries" are the DRC, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

### Conflict Minerals Policy

Delta Apparel, Inc. and its subsidiaries and affiliates support the Dodd-Frank Act's goals of preventing armed groups in the Covered Countries from benefitting from the sourcing of Conflict Minerals from that region. We are committed to responsible sourcing of materials for our products and we expect that our suppliers will be similarly committed. We also support greater transparency in the supply chain, particularly with respect to the sourcing of Conflict Minerals. Accordingly, we have adopted this Conflict Minerals Policy and we expect our suppliers to adopt a similar policy and to partner with us to: (i) provide appropriate information and conduct necessary due diligence to facilitate our compliance with the Conflict Minerals Rules, and (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a manner that results in products and materials that are "DRC Conflict Free", which means that the product or material does not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries.

### Supplier Expectations

As a supplier of Delta Apparel, Inc. or its subsidiaries or affiliates, we expect the following:

- Your company will not supply us with any products or other materials that directly or indirectly finance or benefit armed groups in the Covered Countries;
- Your company is expected to source Conflict Minerals only from sources that are identified as DRC Conflict Free;
- Your company should develop policies, procedures and due diligence processes that are reasonably designed to prevent products or materials that are not DRC Conflict Free from entering our supply chain and to provide transparency as to the source of any Conflict Minerals; and
- Your company should take measures to identify the steps in the supply chain through which Conflict Minerals are introduced, and to undertake all due diligence efforts necessary to identify the smelter, refiner and/or mine from which Conflict Minerals originate, including requiring direct or indirect

suppliers to your company to cooperate in diligence efforts and to provide any information necessary to facilitate our compliance efforts with respect to the Conflict Minerals Rules.

In an effort to meet the above expectations, our suppliers are expected to:

- Implement policies and procedures that are consistent with this Conflict Minerals Policy and require that your direct and indirect suppliers do the same;
- Establish procedures and contractual provisions that facilitate the traceability of Conflict Minerals within the Delta Apparel, Inc. supply chain and the sourcing of DRC Conflict Free products and materials under all circumstances;
- Upon request, provide us with timely and accurate information regarding the source of Conflict Minerals in our supply chain and the steps taken to determine whether such products and materials are DRC Conflict Free, including whether the source has been verified by a recognized, independent third party;
- Use reasonable efforts to source Conflict Minerals from smelters and refiners that have been validated by a recognized, independent third party as DRC Conflict Free; and
- Advise us as promptly as possible of any determination that any products or materials in our supply chain are not DRC Conflict Free.

We evaluate our relationship with our suppliers on an ongoing basis and this evaluation includes the extent to which a supplier has failed to reasonably comply with this Conflict Minerals Policy. If a supplier's efforts are deficient, we may take any action we deem appropriate, including but not limited to termination of the supplier relationship.

Nothing in this Conflict Minerals Policy is intended to grant any additional rights to any of our suppliers or to in any way modify or otherwise limit our contractual or legal rights.

#### **Additional Information**

Please contact the Company's General Counsel at (864) 232-5200 ext. 6604 should you have any questions regarding this Conflict Minerals Policy.