

ACTUANT CORPORATION

Conflict Mineral Policy

Summary:

As a global diversified industrial company with operations in more than 30 countries, Actuant Corporation (Actuant) is committed to ensuring the safety, health and protection of people and the environment worldwide. We promote these principles in our business practices, code of conduct and conflict mineral policy.

Actuant, including all subsidiaries, intends to be compliant with the provisions of the Dodd-Frank Act and other regulations concerning the responsible sourcing of our components and raw materials.

Regulatory Background:

In August 2012 the Securities and Exchange Commission ("SEC") adopted a conflict minerals rule ("Conflict Minerals Rule") as mandated by Section 1502 of the Dodd-Frank Act. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the Democratic Republic of the Congo (the "DRC") and its adjoining countries.

Actuant Policy Statement:

Actuant takes its obligations under SEC and other regulations seriously and intends, to the extent possible, to comply with both the letter and spirit of the Conflict Minerals Rule. Actuant further commits to refrain from, directly or indirectly, taking or supporting any action which contributes to the financing of armed groups that are committing human rights abuses in the DRC and other covered countries. Actuant has adopted this policy as part of our efforts to encourage our suppliers to respect human rights and not contribute to conflict.

Actuant will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Consistent with the foregoing, those of our suppliers who supply or manufacture components, parts or products containing conflict minerals and wish to continue to do business with Actuant, are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict or human rights abuses.

Assessing and Responding to Identified Risks:

Actuant believes in establishing and maintaining long-term relationships with suppliers. However, if we determine that any supplier is violating this policy, we will either suspend or discontinue the use of the supplier immediately or require it to commit to a suitable corrective action or risk mitigation plan. Any supplier's continued failure to adhere to Actuant's policies and/or a refusal on its part to address issues of concern will likely lead to suspension or termination of our business relationship with the supplier.

Grievance Mechanism and Reporting:

Any employee, customer or vendor with concerns regarding this Conflict Mineral policy, in possession of information regarding suspected violations of the policy or suspected use of conflict minerals in Actuant products, should report such information to Dawn Boland (Actuant Corporate Counsel) at 262.293.1948.