

GIBRALTAR

CONFLICT MINERALS POLICY

Gibraltar Industries, Inc. (“Gibraltar”) is committed to the highest standards of ethics and business conduct. Accordingly, we fully support the goals and objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), which aims to prevent the use of certain “Conflict Minerals” that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (“DRC”) and adjoining countries (as defined in the Act). “Conflict Minerals” are defined to include gold and tin, tantalum and tungsten which are derivatives of, cassiterite, columbite-tantalite and wolframite regardless of where they are sourced, processed or sold.

The Act requires manufacturers, like Gibraltar Industries which files certain reports with the Securities and Exchange Commission, to disclose whether the products they manufacture or contract to manufacture contain “Conflict Minerals” that are “necessary to the functionality or production” of their products, and that they have a due diligence process in place to determine the facilities used to produce Conflict Minerals, the country of origin of the minerals and the mine or location of origin.

Gibraltar does not support the purchase of any Conflict Minerals from the DRC or countries adjoining the DRC. We recognize that tracing the origin and chain of custody of the Conflict Minerals contained in our products is a complex process, which requires the cooperation and support of our direct and indirect suppliers. To this end, suppliers of products that contain any Conflict Minerals are required to perform due diligence on the source and chain of custody of such Conflict Minerals in order to provide Gibraltar with the source country of the Conflict Minerals and a conclusion relative to the source of the Conflict Minerals.

We expect our suppliers (both directly and indirectly) to source any Conflict Minerals from countries other than the DRC and adjoining countries and we reserve the right to request from any supplier at any time such information, certifications and documentation as we deem necessary to monitor or assess compliance with this policy.

Any supplier which is found to be in violation of our Conflict Mineral Policy will be required to promptly implement a remediation plan. Gibraltar Industries reserves the right to conduct audit procedures to assess vendor supply chains and to confirm vendor compliance with our Conflict Mineral Policy.

Continued non-compliance or lack of willingness to take steps to address issues of concern may ultimately lead to the termination of the supplier relationship.