

CORPORATE POLICY

Title: **CONFLICT MINERALS**
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Approval:

Signature

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OM Group is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility.

OM Group supports the goals and objectives of Section 1502 of the Dodd-Frank Act, (“Act”) which aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (“DRC”) or an adjoining country as defined in the Act. Conflict Minerals comprise the following:

- Columbite – tantalite (sometimes referred to as coltan) (derivative: tantalum),
- Cassiterite – (derivative: tin),
- Gold
- Wolframite – (derivative: tungsten),

These minerals and their derivatives could expand to include any other mineral or their derivative determined by the U.S. Secretary of State to be financing the DRC conflict. The Act requires companies to perform due diligence with respect to the sourcing of conflict minerals and to file annual reports relating to use of conflict minerals.

OM Group is committed to using conflict-free minerals in its products and complying with the conflict minerals diligence and reporting obligations required under the Act. OM Group suppliers are required to comply with this commitment relating to conflict minerals and responsible sourcing. In turn, our suppliers are responsible for passing these same requirements onto their suppliers. OM Group expects its suppliers to implement a policy and process to assure us that the mining of tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that perpetrate human rights abuses in the DRC or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to OM Group.

OM Group appreciates the commitment of its suppliers to the goal of using conflict-free minerals in all of their products.

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