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SOLENIS POLICY Conflict Minerals

1.0 Policy

Solenis, its commercial units and majority-owned or controlled subsidiaries (“Solenis”) will ensure procurement of our raw materials, intermediates or other goods are in compliance with the conflict minerals rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Conflict Minerals Rule) issued by the U.S. Securities and Exchange Commission (SEC) as well as the EU Conflict Minerals Regulation.

2.0 Definition of conflict minerals

In 2012, the SEC issued the final conflict minerals rule, requiring reporting of the presence of tin, tungsten, tantalum and gold (3TGs) and other minerals determined by the U.S. government to be financing conflict in the Democratic Republic of the Congo or adjoining countries.

In 2017, the European Union passed a new regulation that ensures members import these minerals from responsible sources only.

3.0 Conflict mineral program

Solenis supports the goal to end violence and human rights violations in regions of conflict. In order to ensure that our raw materials meet this goal, Solenis from time to time performs a self-assessment to determine our risk profile relative to any raw materials which may be considered as a conflict mineral. As a result of our self-assessment, we will make requests to suppliers for more information relative to possible use of conflict minerals in the production of Solenis’ raw materials, intermediates or other goods.

Solenis has implemented this policy to prevent sourcing of conflict minerals in the future and reserves the right to deny future business to suppliers who are unable to meet these requirements.



4.0 Owner

Chief Procurement Officer

5.0 Scope

This policy applies to Solenis in the United States and the European Union.

6.0 Exceptions

There are no exceptions to this policy.