

## **CONFLICT MINERALS POLICY**

Ellison Surface Technologies, its subsidiaries and affiliates, (collectively “EST”) support the fair and dignified treatment of all people. Accordingly, EST hereby states its policy on Conflict Minerals.

Although not regulated under the Security and Exchange Commission’s Conflict Mineral rules, many of EST’s customers are and it is consistent with EST’s values to take this action and ensure responsible sourcing.

“Conflict Minerals” consist of tin, tantalum, tungsten, and gold (including their ores or derivatives) that come from the Conflict Region. The “Conflict Region” consists of the Democratic Republic of Congo and adjoining countries. Sadly, violent conflict and exploitation persists, and Conflict Minerals in the Conflict Region may contribute to human rights abuses and continuing conflict. EST therefore commits to ensure that it will not knowingly procure Conflict Minerals from the Conflict Region unless certified as “Conflict Free”.

EST will execute this commitment through due diligence, including prudent procedures, training, assessments, and certifications and questionnaires from its suppliers. Furthermore, EST will work with its suppliers to assist them as we strive to be a part of a supply chain free of Conflict Minerals.