

Castolin Eutectic

Conflict Materials framework

Purpose:

Castolin Eutectic Global and its Castolin Eutectic Management Team (CEMT) value integrity as a core and defining characteristic of how our business operates. Castolin is committed to maintaining a socially and environmentally responsible supply chain and will therefore take all appropriate action to avoid illegal and unethical mineral sourcing in its products. Castolin supports the goal of ending violence, human rights violations and environmental devastation in covered countries and will endeavor to purchase raw materials exclusively from suppliers with environmentally and socially sound business practices.

Guiding Principles:

Castolin has a high level of concern regarding the exploitation and the trade of conflict minerals originating in the Democratic Republic of the Congo (DRC) that help finance violent conflict in the eastern DRC and cause an emergency humanitarian situation. Conflict minerals include coltan (niobium, tantalum), cassiterite (tin), gold, and wolframite (tungsten) as well as associated refined metals that may directly or indirectly finance or benefit armed groups in the eastern DRC and surrounding regions. Armed conflict in those regions leads to both human rights violations and environmental damage.

Scope:

In July 2010 and August 2012, new legislation from the US Securities and Exchange Commission (S.E.C.), was signed into US law, which pertains to the use of conflict minerals (Dodd–Frank Wall Street Reform and Consumer Protection Act). This law may affect Castolin's supply chain of tungsten carbides.

Castolin approach:

In this regard, Castolin will continue to request written confirmation that the powders or products supplied by its vendors do not contain any conflict minerals (which are those minerals originating in the DRC or its surrounding countries). Castolin also intends to comply with the principles set forth by the United Nations and US Congress.

Responsibility for this policy framework:

The Castolin Eutectic Management Team has overall responsibility for ensuring the policy complies with the Company's legal and ethical obligations and all those under the company's control comply with it. Any individuals involved within Castolin Eutectic's supply chain are responsible for ensuring those reporting to them understand and comply with this policy framework.

Castolin is currently not aware of the use of any conflict minerals in its products.

CEO Castolin Eutectic

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VP Global Services Castolin Eutectic

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