Conflict Minerals Policy

In August 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain "conflict minerals" originating from the Democratic Republic of the Congo (the "DRC") or adjoining countries. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations. "Conflict minerals" refers to columbite-tantalite (coltan), cassiterite, wolframite, gold, and the derivatives tantalum, tin, and tungsten (3TGs), without regard to the location or origin of the minerals or derivative metals.

FMI Chemical, Inc. supports industry-wide efforts to identify, reduce, and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries that are financing or benefiting groups committing human rights violations. FMI Chemical, Inc. recognizes that it has a responsibility to source minerals ethically, regardless of our regulatory obligations, and perform due diligence to determine the origin of any minerals that may have been sourced from high-risk regions.

In order to meet these commitments, FMI Chemical, Inc. has employed the Assent Supply Chain Sustainability Platform to routinely assess our suppliers' compliance with this policy by way of the Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI) to gather and exchange supply chain information.

Suppliers to FMI Chemical, Inc. are expected to establish their own responsible minerals policies, due diligence frameworks, and management systems that align with RMI and OECD guidance. Suppliers' programs should work to provide transparency regarding the origin of minerals contained in the products they source.