

# Policy: Conflict Minerals

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<b>Policy owned by:</b>	Global Director, Operations and Supply Chain
<b>In consultation with:</b>	Sourcing and Supply Chain Director
<b>For information:</b>	Leadership Board
<b>Approved by:</b>	Chief Financial Officer

## Purpose

The purpose of this Policy is:

- (a) Ensure compliance with applicable regulatory requirements related to Conflict Minerals;
- (b) Acknowledge the risk of not managing the supply chain responsibly.

## Policy Statement

Per the Dodd-Frank Act, the Securities and Exchange Commission (“SEC”) issues rules relating to the use of “Conflict Minerals” within manufactured products. Conflict Minerals are tin, tantalum, tungsten and gold (also known as “3TG”). The SEC requires any SEC registrant whose products contain any 3TG (“3TG Product”) to determine whether the 3TG in the 3TG Product originated from the Democratic Republic of the Congo (“DRC”) or adjoining countries (collectively, the “DRC Region”) and, if so, whether the 3TG is “conflict free”. “3TG Conflict Free” means that the supply chain is transparent and the 3TG in 3TG Products does not benefit armed groups responsible for serious human rights abuses in the DRC Region.

## Commitment

Armstrong Fluid Technology, as a private company, is not required to comply with the SEC’s 3TG rule. However, Armstrong Fluid Technology understands the importance of sourcing conflict-free minerals and will work with our suppliers to strive towards sourcing product that is considered “3TG Conflict Free”.

## Expectations of Suppliers

We expect our suppliers, at a minimum, to:

Require their suppliers to work towards achieving “3TG Conflict Free” status. To provide Armstrong Fluid Technology with Conflict Mineral data when requested, identifying 3TG Product they sell to Armstrong Fluid Technology and the smelter that provided the original 3TG material. Armstrong Fluid Technology has commenced the practice to survey our suppliers on Conflict Minerals. Upon request, suppliers must complete the Conflict Mineral Reporting Template (CMRT). Armstrong Fluid Technology reviews these surveys and works with non-compliant suppliers to place them on action improvement plans.

Ultimately, supply 3TG Product that is 3TG Conflict Free.

## **Responsibilities**

It is the responsibility of the Global Director, Operations and Supply Chain to make decisions regarding the maintenance of this policy.

It is the responsibility of the Leadership Board Members and Country Leaders to ensure that this policy is communicated and adhered to.

It is the responsibility of all Armstrong employees, both full and part time, contractor and freelance, to understand this policy.

## **Records Management Statement**

The records associated with this policy are controlled by the Country Leaders.

## **Questions**

Employees can approach the Global Director, Operations and Supply Chain if they have questions regarding this policy.

## **Procedure details**

There are no procedures related to this policy at this time.