



Conflict Minerals Policy

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IMC International Metalworking Companies B.V., through its subsidiaries and affiliates worldwide ("IMC Group"), is engaged in the business of manufacturing, developing, marketing and selling of carbide cutting tools and other related products.

Over the years, with increasing awareness of and adherence to corporate social responsibility, enterprises pursue high international standards of good corporate governance. Such standards require the exercise of control over the degree in which the supply-chain may impact our society. As a result of such progress, cooperation amongst all participants in the supply-chain has become a prerequisite condition for many commercial interactions in our ecosystem.

It is in this context that we would like to draw your attention to the relevant legal and social requirements, in connection with the sourcing and utilization of certain minerals known as "Conflict Minerals".

Specifically, it was recognized that enterprises engaged in the sourcing of the minerals: columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives, tantalum, tin and tungsten, from the Democratic Republic of the Congo (DRC) and "Adjoining Countries", including: Angola, Burundi, Central African Republic, Congo Republic, Rwanda, Sudan, Tanzania, Uganda, and Zambia, were at risk of contributing to conflict in such countries.

Accordingly, high standards of international trade were set and promoted by the Organization for Economic Co-operation and Development (the "OECD"), the United States Congress and the United States Securities and Exchange Commission (the "SEC"), with an aim to facilitate "Conflict Free", fair and sound international trade throughout the supply-chain.

As one of the key leading players in the hard metal industry, we are committed to ensure that all minerals which may be contained in some IMC products, are and shall be acquired "Conflict Free", with every due respect for human rights and in strict conformity with these high international trade standards.

To pursue these meaningful standards we have resolved to adopt the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas**.

We are implementing various means, including but not limited to:

- Initiating reasonable enquiry and discussions with our immediate suppliers.
- Informing immediate suppliers of our strict expectation that they will take similar measures with their respective suppliers to ensure alignment throughout the supply chain.
- Incorporating supplier disclosure requirements in Supply Agreements and Group Standard Terms and Conditions of Purchase.
- Publishing this policy and applicable updates are online at: www.imc-companies.com

We hope that the above information will be helpful, in your own effort and assessment of Conflict Minerals.

If you have any further questions or concerns, please do not hesitate to contact us.

