



Conflict Mineral Policy

GHX Industrial, LLC is dedicated to sourcing materials from vendors that share our standards regarding human rights, environmental responsibility, and ethics.

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) approved the Final Rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”). Conflict minerals currently are columbite-tantalite (coltan; i.e., tantalum); cassiterite (i.e., tin); wolframite (i.e., tungsten); gold and/or their derivatives. The rule enforces reporting requirements on publicly traded companies subject to the SEC to annually disclose the occurrence of conflict minerals originating in the Democratic Republic of the Congo (“DRC”) or surrounding countries (“Covered Countries”) in the products they manufacture or contract to manufacture whereby the conflict minerals are necessary to the functionality or production of a product. **GHX Industrial, LLC** is committed to complying with the legislation affecting their publically traded customers subject to the SEC, and is implementing a Conflict Minerals Reporting Program to meet their requests for information regarding Dodd Frank 1502.

GHX Industrial, LLC is committed to avoiding the use of conflict minerals which finance or assist armed groups in the DRC or Covered Countries. Our suppliers will be requested to declare that all products supplied either:

Do not contain tantalum, tin, tungsten or gold that are necessary to their production or functionality; or

If they do contain these materials, they originate from non-conflict areas or from smelters that have been validated by an independent party to be conflict free.

GHX Industrial, LLC will annually evaluate its supplier relationships to ensure continued compliance with this policy. We expect our suppliers to pass these expectations on to their suppliers.

GHX Industrial, LLC values its suppliers and appreciates their commitment to the target of using materials that contain conflict-free minerals.