

## **Nye Lubricants, Inc. Conflict Minerals Policy Statement**

The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and the Cobalt reporting template implemented in October 2019.

The definition of “conflict minerals” includes gold, tin, tantalum, tungsten, and cobalt and the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future. Nye adheres to these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and surrounding countries, which has been partially financed by the exploitation and trade of these “conflict minerals”.

Nye Lubricants will not knowingly procure specified minerals that originate from the “conflict region”, or that are not certified as “conflict-free”.

Nye will exercise reasonable due diligence, which includes asking suppliers to provide written evidence documenting that raw materials supplied to Nye originate from outside the “conflict region” or, if they originate from within the “conflict region”, that the mines or smelters are certified as “conflict-free”. The objective is to ensure that only “conflict-free” materials are used in Nye products.

If we discover the use of minerals produced in facilities that are considered to be potentially “non-conflict free” in any material we procure, we will take appropriate action to confirm and certify the product as “conflict-free” or eliminate its use.