



Conflict Minerals Policy Statement

Cla-Val is committed to conducting business with a high degree of integrity and to conduct our business in a responsible manner. We support ending the violence and human rights violations in the mining of certain minerals in “Conflict Regions” and fully enforce Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”).

The definition of “conflict minerals” refers to gold, tin, tantalum and tungsten, as well as the derivatives of cassiterite, columbite-tantalite, and wolframite. Cla-Val ensures that these minerals are not introduced into Cla-Val’s supply chain if they have been processed or manufactured in any of the specified “Conflict Regions”.

Cla-Val is committed to support the aims and objectives of the U.S legislation on the supply of “conflict minerals” through the following efforts:

- Cla-Val does not knowingly procure specified metals that originate from facilities in the “Conflict Region” that are not certified as “Conflict Free”.
- All Vendors and Sub Contracted Suppliers are asked to undertake reasonable due diligence with their supply chains to assure compliance with the Dodd-Frank Act

This due diligence includes having our suppliers provide written evidence documenting that raw materials containing Conflict minerals originate from outside the conflict region or are certified to be conflict free. If Cla-Val identifies a reasonable risk that a supplier is violating the commitments set forth in this Conflict Minerals Policy or our Supplier Code of Conduct, we will engage with this supplier to implement an appropriate corrective action plan.