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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. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the “functionality or production” of those products.

The “Conflict Region” is the eastern portion of the Democratic Republic of the Congo (DRC and surrounding countries).

“Conflict minerals” are gold, derivatives of cassiterite (tin), columbite-tantalite (tantalum) and wolframite (tungsten) that originate from the Democratic Republic of the Congo and its neighboring countries. The U.S. Secretary of State may designate other minerals in the future.

Americhem Commitment:

1. Support the aims and objectives of the U.S. legislation on the supply of “conflict minerals”.
2. Do not knowingly procure specified metals that originate from facilities in the “Conflict Region” that are not certified as “conflict free”.
3. Require suppliers to provide written evidence documenting that they have established policies, due diligence frameworks, and management systems, consistent with the Organization of Economic Co-operation and Development (OECD) “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”, that are designed to accomplish this goal.

Sincerely,

Rod Manfull
Vice President - Global Supply Chain