



POLICY

No.: D-12
Date: Dec 2019

Section: **Compliance**
Unit: **All Units**

Supersedes
No.: D-12
Date: Dec 2014

Subject: **Supply Chain Conflict Minerals Policy**

Supply Chain Conflict Minerals Policy Element Solutions Inc

This global policy applies to Element Solutions Inc (“Element Solutions”), its subsidiaries and their respective supply chains and covers sourcing in the Democratic Republic of the Congo and its adjoining countries as well as other conflict-affected, high-risk areas around the world, as determined from time to time. Each subsidiary may adopt additional procedures to support and implement this policy.

Element Solutions Values

Element Solutions believes it is essential to establish validated, conflict-free sources of gold, columbite-tantalite, cassiterite, and wolframite (collectively, including their derivatives, tantalum, tin and tungsten and any other minerals identified from time to time, the “Conflict Minerals”), so that these minerals can be procured in a way that contributes to economic growth and development, rather than to conflict.

In this context, Element Solutions engages in rigorous due diligence efforts designed to verify - whenever possible - the source of Conflict Minerals used in its supply chain. Element Solutions is committed to purchasing Conflict Minerals and other materials only from environmentally and socially responsible suppliers that do not finance or benefit armed conflict or human rights abuses.

In support of this policy, Element Solutions:

- established a supply chain compliance program and a risk-based due diligence process based on applicable Conflict Minerals rules and regulations and, where appropriate, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”);
- works with its supply chain partners to trace the sources of Conflict Minerals in its products as part of its efforts to eliminate materials deemed to originate from a conflict region (to the extent not responsibly sourced), as Element Solutions will neither tolerate nor knowingly contribute to any serious abuses;
- reviews, suspends and/or discontinues engagement with suppliers posing a reasonable risk by sourcing from, or being linked to, any party committing serious abuses;
- adopted practices and tools from the Responsible Minerals Initiative where appropriate; and

- supports industry trade groups, suppliers and customers in establishing a verifiable supply chain that draws Conflict Minerals from conformant mines and smelters.

Supplier Commitment

Element Solutions expects and requires its suppliers to identify and conduct appropriate supply chain due diligence on any Conflict Minerals supplied to Element Solutions, determine the source of any such Conflict Minerals and provide the Conflict Minerals source information necessary to support Element Solutions' own due diligence and reporting obligations under the U.S. Securities and Exchange Commission regulations.

Suppliers must also cooperate with Element Solutions to make available to Element Solutions and/or its agents full material declarations and other relevant documentation that identify the sources and amount of all Conflict Minerals contained in Element Solutions' products. In connection with any transaction involving Conflict Minerals, Element Solutions requires all suppliers to provide a Conflict Minerals Certification.

Element Solutions encourages individuals or suppliers who have any questions relating to this policy or who wish to report possible violations of this policy to contact their Element Solutions representative. You may also reach out to the Legal Department of Element Solutions by contacting **John E. Capps** at conflict_minerals@elementsolutionsinc.com.

As a leading global producer of specialty chemical products, Element Solutions is committed to ensuring the safety, health and protection of people and the environment worldwide. We promote these principles through our global business practices and within both our Business Conduct and Ethics Policy and Supplier Code of Conduct.

Approved:



John E. Capps

Executive Vice President, General Counsel and Secretary