

Conflict Mineral Policy Statement:

Clarus Corporation and its subsidiaries (collectively, “we”, “us” or “our”) support ending violence and human rights violations in parts of the Democratic Republic of the Congo and surrounding countries (the “Conflict Area”). This violence, and the related human rights violations, has been partially financed by the exploitation and trade of Conflict Minerals (as defined below) mined in the Conflict Area. The U.S. Securities and Exchange Commission (“SEC”) has adopted rules to implement reporting and disclosure requirements related to Conflict Minerals, pursuant to 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 in a manner or amount necessary to the functionality or production of those products. “Conflict Minerals” are defined by the SEC as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum and tungsten.

We do not source Conflict Minerals directly, but they may exist in the products and components we obtain from our vendors and suppliers. We support ethical practices in the use and sourcing of Conflict Minerals, and we therefore encourage our vendors and suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing Conflict Minerals do not originate from the Conflict Area.

In support of this policy, we will:

- Exercise reasonable due diligence within our supply chain consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our vendors to do likewise with their suppliers.
- Provide, and expect our vendors and suppliers to cooperate in providing, reasonable due diligence information regarding the source of Conflict Minerals in our supply chain.
- Comply with applicable SEC Conflict Minerals rules including, but not limited to, reporting requirements; and
- Work with our vendors and suppliers to promote adherence to industry protocols and ethical standards across our supply chain.

In the event that we determine that products and components supplied to us contain Conflict Minerals that originate in the Conflict Area, we will work with our suppliers to try to find alternate sources for such products and components.

We are committed to working with our vendors and suppliers to promote adherence to industry protocols and ethical standards across our supply chain.