



POLICY

No.: D-12
Date: Dec 2014

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

Supersedes
No.:

Subject: **Conflict Minerals Policy**

Date:

Conflict Minerals Policy Element Solutions Inc

Background

There has been increased awareness of violence and human rights violations in the mining of certain minerals in the Democratic Republic of the Congo and any country that shares an internationally recognized border with the Democratic Republic of the Congo (collectively, the "Covered Countries"). Companies around the globe have been requested to practice reasonable due diligence within their supply chain to assure that the following minerals (collectively, the "Conflict Minerals") are not being sourced from mines in any Covered Countries:

- gold;
- columbite-tantalite (including its derivative tantalum);
- cassiterite (including its derivative tin); and
- wolframite (including its derivative tungsten).

In the United States, applicable law requires public companies (including Element Solutions Inc and its affiliates (collectively, "Element Solutions")) to file annual reports with the U.S. Securities and Exchange Commission indicating the use of Conflict Minerals originating from any Covered Countries.

Element Solutions Values

Element Solutions believes it is essential to establish validated, conflict-free sources of Conflict Minerals so that these minerals can be procured in a way that contributes to economic growth and development, rather than to conflict. Element Solutions engages in rigorous due diligence efforts designed to verify - whenever possible - the source of Conflict Minerals used in Element Solutions' supply chain. Element Solutions is committed to purchasing Conflict Minerals and other materials only from environmentally and socially responsible suppliers.

In support of this policy, Element Solutions will:

- work with our supply chain partners to trace the sources of Conflict Minerals in Element Solutions' products and eliminate materials that originate in any Covered Country (to the extent not responsibly sourced);
- support industry trade groups, suppliers and customers in establishing a verifiable supply chain that draws Conflict Minerals from conflict-free mines; and
- comply with applicable laws and regulations regarding the use of Conflict Minerals in Element Solutions' products.

Supplier Commitment

Element Solutions expects and requires its suppliers to comply with applicable laws and regulatory requirements to source Conflict Minerals only from conflict-free sources, and to support Element Solutions' reporting and other legal obligations regarding the use of Conflict Minerals. As part of its compliance program, Element Solutions has obtained, and with respect to new sources is in the process of obtaining, information from metal suppliers concerning the origin of any Conflict Mineral used in the manufacture of Element Solutions' products. Suppliers of Conflict Minerals used in the manufacture of Element Solutions' products must demonstrate that they understand the conflict minerals laws and will not procure specified metals that originate from any Covered Countries. In connection with any transaction involving Conflict Minerals, Element Solutions requires all suppliers to provide a Conflicts Minerals Certification.

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.

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 its Element Solutions representative. You may also reach out to Element Solutions' Legal Department by contacting **John E. Capps at (561) 207-9600 or john.capps@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 in our global business practices and our code of conduct.

Approved:



John E. Capps
Executive Vice President, General Counsel and Secretary