



CONFLICT MINERAL SOURCING POLICY

“Conflict minerals”¹ originating from the Democratic Republic of the Congo (DRC) are sometimes mined and sold, “under the control of armed groups”, to “finance conflict characterized by extreme levels of violence².” These minerals include Tantalum, Tin, Tungsten and Gold (3TG). Some of these minerals can make their way into the supply chains of the products used around the world, including those in the metals manufacturing industry. Barron does not intentionally use Tin or Gold in our products. Tantalum and Tungsten are used in small amounts in some special alloys. Tungsten is also used in welding electrodes. As part of Barron’s commitment to corporate responsibility and respecting human rights in our own operations and in our supply chain, Barron’s goal is to use Tantalum and Tungsten in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region. Barron expects our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and materials supplied to us containing conflict minerals are DRC conflict free³.

In support of this policy, Barron Industries will:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the tantalum, tin, tungsten, and gold in our supply-chain are “conflict free”².

Adopted: 21 November 2019

¹ “Conflict minerals” as defined by Securities and Exchange Commission (SEC) rules is a broad term which means columbitetantalite (coltan), cassiterite, gold, wolframite, or their derivatives which are limited to tantalum, tin or tungsten, regardless of whether these minerals finance conflict in the Democratic Republic of the Congo (DRC) or adjoining countries.

² Dodd-Frank Act Section 1502.

³ DRC conflict free “means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups” as defined SEC Rule 13p-1 under the Securities Exchange Act of 1934