

1. BACKGROUND

1.1. Complete Tubular Products is committed to acting in a socially and environmentally responsible manner, to complying with the law, to meeting its customer commitments, and to supporting its customers’ businesses. Complete Tubular Products supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefitting from the sourcing of Conflict Minerals (i.e. tantalum, tin, gold, or tungsten) from that region.

2. POLICY

2.1. Complete Tubular Products is committed to purchase only those materials, parts and products containing minerals that have been procured through a validated conflict-free supply chain to avoid the use of minerals that have financed conflict in the covered countries, and we expect our suppliers to abide by the same standard.

Complete Tubular Products is taking a variety of actions designed to assist in compliance with the conflict minerals rules. For example:

- we have identified, and will continue to identify, conflict minerals necessary for the production or the functionality of covered products that we sell;
- we have performed, and intend to continue to perform, supply chain due diligence in general accordance with the Organization for Economic Cooperation and Development’s internationally recognized and established due diligence framework;
- we expect our direct suppliers to perform similar due diligence on the sources of conflict minerals in their supply chains, and expect them to require their own suppliers to do the same;
- once a robust and validated conflict-free supply chain is established or a robust mineral tracing program is developed, we will expect our direct suppliers to procure only minerals using that validated supply chain, so as to avoid the use of minerals that have financed conflict in the covered countries; and
- in the event that a direct supplier is found to supply us with necessary conflict minerals that have not been procured through a validated supply chain or that are otherwise found to have financed conflict, we will take action such as recommending that such supplier seek alternative means of sourcing, or failing that, the supplier shall be removed from the Complete Tubular Products supply chain.

This does not mean Complete Tubular Products bans the use of minerals sourced from any mine or smelter in the region as such a policy may harm legitimate miners in the region. Complete Tubular Products encourages its vendors to only use responsible sources in the region.

This Policy will be reviewed periodically to ensure ongoing suitability, and is in addition to our suppliers’ basic obligations to comply with Complete Tubular Products standards.

REVISION	DATE	AUTHOR	APPROVAL	NOTES
0	DEC 5 2017	NG	GC	INITIAL ISSUE
1	NOV 28 2024	DMK	--	REVISION TO CTP