

OP-18-074

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Conflict Minerals Policy Statement

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Process Owner: Administration Management:

1. Scope:

Fluid Conditioning Products is committed to compliance with the US Securities and Exchange Commission's (SEC) rules relating to the implementation of reporting and disclosure requirements with respect to "conflict minerals". These rules were mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (http://www.sec.gov/News/PressRelease/Detail/PressRelease/1365171484002).

2. Definition:

The SEC's rules define the term "conflict mineral"... as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country."

3. Process:

Fluid Conditioning Products expects its suppliers to support its compliance commitment by exercising appropriate due diligence in the source and chain of custody of regulated minerals and by making their due diligence measures and results available to Fluid Conditioning Products upon request.

It is Fluid Conditioning Products intention to bring industry best-practices to bear in working with our supply chain partners to:

- 3.1. Support the policies underlying the U.S. legislation relating to the supply of conflict minerals;
- 3.2. Require suppliers to provide only "conflict free" material;
- 3.3. Upon identification of any sources of supply of conflict minerals that are deemed to be "non-conflict free," to institute remedial action up to and including alternative sourcing from "conflict free" resources.



YES NO

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Revision:

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Process Owner: Administration					Management:			
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Training Required?	Rev	Pages or sections affected				Date		
		Revised		Added		Removed	Date	
YES NO	-			Initial Release			10/31/17	
YES NO								
YES NO								