



FAIRMONT SUPPLY COMPANY AND AFFILIATES CONFLICT MINERALS POLICY

Fairmont Supply Company and its affiliates (“Fairmont Supply”) are committed to responsible sourcing, and we expect our suppliers to share in that commitment. An important element of our commitment to responsible sourcing is our commitment to identifying and eliminating the use of minerals whose sale helps finance groups committing human rights violations in conflict-afflicted regions.

The term “Conflict Minerals” as used in this policy refers to gold, columbite-tantalite (sometimes called “coltan”), cassiterite, wolframite and the derivatives tantalum, tin, and tungsten. These “Conflict Minerals” can be mined or extracted from various regions of the world, but one region from which these minerals are sourced is the Democratic Republic of Congo (DRC) and its adjoining countries, an area sometimes referred to as the “DRC Region.”¹ Because of ongoing conflict in the DRC Region, the extraction and sale of Conflict Minerals in that region is sometimes controlled by armed groups that engage in human rights violations and that use the sale of Conflict Minerals to finance their activities. Fairmont Supply is committed to sourcing Conflict Minerals only from sources that are not engaged in human rights violations, and we therefore have adopted this policy to communicate our expectations to our suppliers that they take appropriate steps to ensure that they are not sourcing these minerals in a manner that may directly or indirectly finance or benefit armed groups in the DRC Region.

We align our practices with the implementation guidance for downstream companies provided by the Organization for Economic Co-operation and Development (OECD) regarding its Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We expect our suppliers to work with their own supply chains to trace the 3TG minerals that are contained within their products and to report to us the smelters/refiners from which those minerals were obtained. As part of our due diligence effort, we ask our suppliers, whenever possible, to source 3TG minerals from smelters/refiners that have been validated as “conflict-free” by the Responsible Minerals Initiative’s Conflict-Free Smelter Program, or a similar internationally recognized program to validate that a smelter/refiner of Conflict Minerals does not use minerals whose extraction and sale finances or benefits non-state armed groups in the DRC Region or other conflict-affected regions.

¹ The adjoining countries that, together with the DRC, comprise the “DRC Region” for purposes of this policy are Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.



To assist us in our due diligence on the origin of 3TG minerals in our products, we may require our suppliers to complete and submit the Responsible Minerals Initiative's Conflict Minerals Reporting Template.

GRIEVANCE MECHANISM AND REPORTING

This policy shall be reviewed on a regular basis and revised as needed. Our employees, suppliers and other parties can report concerns and alleged violations of this policy by contacting us in any of the following ways:

- In writing at Fairmont Supply, Attn: Craig Rosati, 437 Jefferson Avenue, Washington, PA 15301;
- By e-mail at: craigrosati@fairmontsupply.com; or
- By toll-free telephone at 1-800-245-9900.

Reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law. Fairmont Supply will not take any retaliatory action against our employees or other parties who report in good faith. Our suppliers are encouraged to contact their normal company sources to seek guidance on the application of this policy.

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