



Conflict Minerals Policy

The Rule

The final rule adopted by the U.S. Securities and Exchange Commission (SEC) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) requires publicly traded companies, subject to the SEC reporting requirements, to report annually on the use and sourcing of “conflict minerals” in their products. Conflict Minerals included Gold, Tin, Tantalum, and Tungsten, as well as their derivatives Cassiterite, Columbite-Tantalite, and Wolframite, originating in the Democratic Republic of Congo or adjoining countries specified in the rule.

Objectives and Actions

The Conflict Minerals Rule was implemented to increase transparency in the supply chain, with a hope to end ongoing violent conflict in the covered countries that the U.S. Congress determined is being partially financed by revenues generated from the mining and transport of conflict minerals.

KSR International Inc. is not required to report directly to the SEC. However, as our customers fall under this requirement, reporting is necessary for KSR International and our global supply chain. We support the requirements of this Rule in reporting annually, documenting due diligence where applicable, and continually improving supply chain transparency.

Supplier Expectations

KSR International Inc. strongly encourages suppliers to:

- Support KSR International Inc. in meeting the requirements of the Rule
- Take appropriate due diligence measures to determine the origin of materials used and supplied in products to KSR
- Increase awareness of the Rule and requirements through the supply chain
- Submit Conflict Minerals Reports annually
- Continue to improve reporting quality year over year