



January 1, 2023

## **Conflict Minerals Policy Statement**

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In support of Victaulic's compliance obligations under the U.S. Conflict Minerals Rule and as part of its commitment to responsible sourcing, Victaulic has adopted this Conflict Minerals Policy. The intent of the Conflict Minerals Rule is to address violence and human rights violations in the mining of these minerals. Conflict minerals are tantalum, tin, tungsten, and gold (known together as "3TG"), which are derivatives of cassiterite, columbite-tantalite (coltan), and wolframite, regardless of where they are sourced, processed or sold.

The Conflict Minerals Rule applies to manufacturers who file periodic reports with the U.S. Securities and Exchange Commission ("SEC") and who manufacture or contract to manufacture products containing 3TG. Victaulic is dedicated to being a responsible corporate citizen and is opposed to human rights abuse. Victaulic is committed to ensuring the health, safety and protection of people who come into contact with its products and business.

As part of this pledge, Victaulic sources products, components and materials from companies that share its values regarding human rights, ethics and environmental responsibility. Consistent with this approach, Victaulic conducts the necessary due diligence to maintain a transparent supply chain to source products that do not contain conflict minerals. Victaulic is, therefore, committed to complying with any applicable requirements under the Conflict Minerals Rule and has implemented a due-diligence process to meet its obligations under the legislation.

Victaulic expects its suppliers to adopt similar policies and procedures. It also requires high social, environmental and human rights standards among its suppliers. In the event Victaulic determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, Victaulic reserves the right to take appropriate actions, including discontinuing the business relationship with the supplier.

Questions regarding this policy may be directed to Victaulic's Global Regulatory Compliance Department.

A handwritten signature in black ink, appearing to read "R. Bucher".

Rick Bucher  
President and CEO