

GLOBAL POLICY

Conflict Minerals


Effective Date.

06/01/2020

Supersedes.

N/A

Approved by:



Nishan Vartanian

President & CEO

OBJECTIVE

MSA supports efforts of the U.S. and other governments to further the humanitarian goal of ending human rights abuses and violent conflict in the Democratic Republic of Congo (the “DRC”), which we understand has been potentially financed by the exploitation and trade of minerals such as columbite-tantalite (coltan), cassiterite, and wolframite, as well as their derivatives, tantalum, tin, tungsten, and gold (3TG), collectively known as “Conflict Minerals.” In addition to enabling MSA to deliver high quality, valuable end products that our customers expect, our suppliers’ commitment is also critical to ensure compliance with applicable Conflict Minerals disclosures which in turn further the goal of ending human rights violations and violent conflict in the DRC. As used in this policy, “MSA” and the “Company” refer to MSA Safety Incorporated and its affiliates.

POLICY

1. MSA is committed to responsible sourcing of materials for our products, including the sourcing of Conflict Minerals, and we expect our suppliers to commit to responsible sourcing. Prompted by provisions within the Dodd-Frank Wall Street Reform and Consumer Protection Act, MSA discloses information annually regarding the use of conflict minerals in our products and where said minerals originate as well as their chain of custody.
2. Although our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting, and refining of Conflict Minerals, MSA expects all suppliers to partner with us to:
 - a. Provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the applicable law regarding disclosure of Conflict Minerals, and
 - b. Adopt appropriate sourcing practices so Conflict Minerals are sourced only in a manner that results in products and materials that are DRC Conflict Free. “DRC Conflict Free” means that the product does not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the DRC or surrounding countries (Covered Countries) or contribute to human rights abuses.
3. MSA has the following expectations of our suppliers:
 - a. Suppliers should not supply us with any products or other materials that directly or indirectly finance or benefit armed groups or contribute to human rights abuses in the Covered Countries.
 - b. Suppliers should source Conflict Minerals only from sources that are DRC Conflict Free.

- c. Suppliers should develop policies, procedures, due diligence processes, and management systems that collaborate with the Responsible Minerals Initiative (RMI) and are designed to prevent products or materials that are not DRC Conflict Free from entering our supply chain and provide transparency regarding the source of any Conflict Minerals.
 - d. Suppliers should provide MSA with timely and accurate information, regarding the source of Conflict Minerals in our supply chain and the steps that have been undertaken to determine whether such products and materials are DRC Conflict Free, including whether the source has been verified by a recognized, independent third party.
 - e. Suppliers should advise us as promptly of any determination that any products or materials in our supply chain are not DRC Conflict Free.
4. Suppliers that do not adhere to conflict minerals regulations, and will not work towards a conflict free supply chain, will be considered as "risk source of supply," and will be eliminated from future business opportunities with MSA in the Company's sole discretion.
 5. Our suppliers, employees, and other interested parties may contact us regarding this MSA Conflict Minerals Policy through the following email address: Product.Stewardship@MSASafety.com

ADMINISTRATION

1. MSA shall establish, implement, communicate, and continually improve appropriate management systems to carry out the requirements of this Policy.
2. MSA shall provide appropriate training and other resources to all employees whose roles are deemed to impact compliance with this Policy.
3. MSA shall continually enhance, evaluate and communicate this Policy.
4. This Policy is administered by the Global EHS Department. Questions regarding this Policy or the administration of this Policy should be referred to that department.