



DRC-conflict mineral free declaration

HEMPEL (USA) is committed to the principles of sustainable development and enjoys a reputation for conducting its business with integrity and respect for applicable law. Hempel is not a publicly traded company and is not subject to SEC oversight but a number of Hempel's customers are regulated.

The observance of societal and ethical standards, respect for laws and responsibility for the environment are part of Hempel's Code of Conduct. HEMPEL (USA) shares your firm's concern regarding the purchase of raw materials containing "conflict minerals" as defined in section 1502(e)(4). of H.R. 4173, of the Wall Street Reform and Consumer Protection Act (Dodd –Frank Act).

SEC (Security and Exchange Commission staff) have verbally provided interpretive clarification guidance that Section 1502 of the Dodd-Frank Wall Street Reform and Protection Act, does not consider the use of chemical compounds manufactured from tin, tantalum, tungsten, or gold (3TGs) to be covered by the final rule. The reporting requirements do not extend to these chemically distinct compounds that are manufactured from a covered metal derivative because these substances are no longer metals or alloys thereof.

Hempel (USA) as a part of supply chain due diligence has reviewed raw materials used in products that it formulates / blends into paint products. These paint products are supplied to customers that may be subject to the SEC "conflict materials" reporting rules. Raw materials used by Hempel (USA) contain only one substance that is manufactured from a metal derivative (tin) of cassiterite. Even though this material is not subject to reporting, Hempel (USA) has conducted a Reasonable Country of Origin Investigation [RCOI] of its suppliers of raw materials containing the organotin compound.

Hempel has specifically asked our suppliers of tin containing materials to confirm that neither they nor their supply chain suppliers source this metal derivative from minerals originating from mines in the Democratic Republic of the Congo, Angola, Burundi, Central Africa, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

Based on the responses Hempel has received to date Hempel does not have any hints or suspicions that the organotin containing chemical compounds sourced to Hempel's supply chain are or were produced with tin that originated in or was sourced from smelters / refiners receiving / processing tin from mines located in the Democratic Republic of the Congo, Angola, Burundi, Central Africa, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

A raw material that does contain a compound manufactured with tin is present in some finished goods products and that materials acts as a catalyst to aid chemical crosslinking or curing.

Tin is present on tinfoil cans / pails (used as small shipping units) purchased from metal fabricators. Tinfoil is a thin steel sheet coated by tin (electrolytic tinning process). Manufacturer of tinfoil has provided declarations that the tin used for that process is not mined in the DRC or on the African continent. Cold rolled steel used in the production of shipping unit containers described as steel pails and steel drums does not contain tin.

Issued by:

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