

## **DMC Global Inc. Conflict Minerals Policy**

DMC Global Inc. (formerly Dynamic Materials Corporation) and its subsidiaries (collectively “DMC” or “We”), its employees, and its Board of Directors are aware that proceeds from the sale of certain minerals (by unrelated parties) might be partially funding wars, human trafficking, and human and natural resource exploitation. We denounce and deplore these practices. These minerals include (a) tin (cassiterite), (b) tantalum (columbite-tantalite), (c) tungsten (wolframite), and (d) gold (the first three collectively referred to as the “3 Ts” and, together with Gold constitute “Conflict Minerals”), as well as other minerals or derivatives if and when designated by the U.S. Secretary of State. Of particular concern are those Conflict Minerals which originate in Democratic Republic of the Congo and surrounding countries (the “DRC Region”)

In July 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Act”) imposed new reporting requirements on companies registered with the U. S. Securities and Exchange Commission (the “SEC”). The SEC promulgated regulations under this Act which were published in final form in August of 2012. The Act and regulations require such public companies to disclose the acquisition and use of Conflict Minerals beginning in 2013. DMC, as a public company, is subject to these requirements, as are many of our customers and suppliers. Thus, DMC is committed to complying with the Act and underlying regulations fully.

Neither the Act nor the regulations thereunder nor our policies are intended to penalize use of products, including Conflict Minerals, from mines where the products do not support armed conflict and its resulting consequences, including mines in the DRC Region. On the contrary, mines in the DRC Region where the products do support armed conflict (“Conflict Mines”) are the prime targets of this legislation and our policies.

Except for the permitted uses under the Act and regulations, ***DMC endeavors not to use Conflict Minerals from Conflict Mines in its products.***

To that end, DMC seeks to identify, reduce and ultimately eliminate the use in its products of Conflict Minerals from Conflict Mines. To aid in DMC’s compliance with the Act and related regulations, DMC takes the following actions:

- We perform supply chain due diligence that substantially complies with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- We take measures to determine the source of Conflict Minerals from Conflict Mines, which may include inquires of suppliers and vendors, surveys, and other communication with the results of such communications being reviewed by an internal DMC team member charged with compliance, DMC senior leadership or other affected business segments, such as accounting, legal or management personnel.
- We encourage our suppliers and vendors to undertake reasonable due diligence with their supply chains in an effort to ensure that Conflict Minerals are being sourced only from mines and smelters/refiners that are not Conflict Mines.

- We do not directly source Conflict Minerals from Conflict Mines and in most instances, we are many levels removed.
- We utilize the Conflict-Free Sourcing Initiative (“CFSI”) reporting template and compare the aggregation of smelter lists provided by DMC’s suppliers and vendors with the CFSI list of compliant smelters to determine which smelters are free of Conflict Minerals. The information provided by DMC’s suppliers and vendors is used to conduct due diligence, including assessing reports for completeness and consistency.

DMC believes in establishing and maintaining long-term relationships with suppliers and vendors whenever possible. However, if we determine that any supplier or vendor is, or a reasonable risk exists that it may be, violating this “conflict minerals policy”, then we will require the supplier to commit to devise and undertake suitable corrective action to move to a conflict free source. DMC’s efforts are not to ban procurement of Conflict Minerals from the DRC Region, but to assure procurement from responsible sources in the DRC Region. We look forward to the time when DMC’s efforts and those efforts of other companies are successful in reducing the funds from Conflict Minerals from Conflict Mines available to the groups and people responsible for these wars and related suffering.