CONFLICT MINERALS POLICY

Regal Cutting Tools has incorporated in contracts and agreements with suppliers the following policy of responsible sourcing of steels and other products that may contain minerals that are potentially sourced from conflict-affected and high risk areas.

We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Annually, we require our suppliers of steel and other materials which may contain conflict materials, to complete a document identified as (CMRT) Conflict Minerals Reporting Template provided by the Electronic Industry Citizenship Coalition (EICC). The report identifies the supplier, authorized contacts, conflict materials contained in their products and the identity and location of smelters supplying products containing tin, tantalum, tungsten and gold.

We will immediately suspend or discontinue engagement with upstream supplies where we identify a reasonable risk that they are sourcing from, or linked to, any party sourcing minerals from conflict-affected and high risk areas.