



Global Conflict Minerals Policy

1. Purpose

Chase Corporation together with its subsidiaries (the "Company") is committed to responsible sourcing and to conducting business with integrity and respect for human rights. This Global Conflict Minerals Policy (this "Policy") establishes the Company's expectations and processes to identify and address risks that tin, tantalum, tungsten, and gold ("3TG") used in products manufactured by or for the Company may directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses.

This Policy is designed to support compliance with applicable laws and standards, including (as applicable): (a) U.S. Securities and Exchange Commission Rule 13p-1 under the Securities Exchange Act of 1934 (the "Conflict Minerals Rule"), and (b) the Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance").

2. Scope

This Policy applies to:

1. the Company's operations and procurement activities globally;
2. suppliers, distributors, contract manufacturers, toll processors, and other third parties that provide materials, components, packaging, equipment, parts, or services that may contain or use 3TG and that are incorporated into, used in, or are necessary to the functionality or production of the Company's products (collectively, "Suppliers");
3. all Company personnel involved in sourcing, procurement, product stewardship, quality, compliance, operations, and supplier management.

This Policy is intended to cover the Company's specialty chemical products sold domestically and internationally. Because the Company's products may be used as inputs in customer products, the Company may also respond to customer inquiries regarding 3TG and responsible sourcing.

3. Definitions

For purposes of this Policy:

- **"Conflict-Affected and High-Risk Areas" ("CAHRAs")** means areas identified as conflict-affected or high-risk under the OECD Guidance, including but not limited to regions with armed conflict, widespread violence, or other risks of harm to people.
- **"Covered Countries"** means the Democratic Republic of the Congo and adjoining countries, as referenced in the Conflict Minerals Rule.
- **"Conflict Minerals"** means 3TG (and any additional minerals or derivatives designated by applicable law).
- **"DRC Conflict Free"** has the meaning used under the Conflict Minerals Rule.



- **“Reasonable Country of Origin Inquiry” (“RCOI”)** means an inquiry reasonably designed to determine whether Conflict Minerals originated in the Covered Countries or are from recycled or scrap sources.

4. Policy Statement

The Company will:

1. strive to source responsibly and to avoid contributing to conflict, financing of armed groups, or serious human rights abuses;
2. conduct risk-based due diligence on the source and chain of custody of Conflict Minerals, consistent with the OECD Guidance;
3. expect Suppliers to support the Company’s RCOI and due diligence efforts by providing timely, accurate, and complete information;
4. communicate this Policy to Suppliers and relevant stakeholders and incorporate it into supplier engagement and contracting as appropriate; and
5. maintain records and implement controls designed to support compliance with the Conflict Minerals Rule if and when applicable to the Company.

5. Governance and Accountability

5.1 Internal Ownership

The Company’s conflict minerals compliance program is sponsored by Supply Chain Management and managed by Vice President of Global Supply Chain.

5.2 Cross-Functional Team

A cross-functional team (which may include Procurement, Supply Chain, Product Stewardship/EHS, Quality, Legal, Finance, and Internal Audit, as appropriate) will:

- oversee implementation of this Policy;
- determine the Company’s product and supplier scoping approach;
- review supplier responses and risk indicators;
- develop and monitor mitigation plans;
- determine whether disclosures (including any SEC filings) are required.

5.3 Training

The Company will provide periodic training to relevant personnel on this Policy and on supplier engagement and escalation procedures.

6. Supplier Expectations

Suppliers are expected to:

1. adopt and maintain policies and management systems designed to enable responsible sourcing of Conflict Minerals;
2. conduct appropriate due diligence in their supply chains, consistent with the OECD Guidance;



3. provide to the Company, upon request, a completed and current Responsible Minerals Initiative ("RMI") Conflict Minerals Reporting Template ("CMRT") or substantially equivalent information, including (where reasonably available) smelter/refiner data;
4. flow down conflict minerals requirements to their relevant suppliers;
5. promptly notify the Company of:
 - any identified use of Conflict Minerals in materials supplied to the Company, and
 - any known or suspected sourcing from CAHRAs or from entities associated with human rights abuses, illegal taxation, bribery, or other serious risks;
6. maintain records supporting their representations and CMRT responses for at least Six (6) years and provide such records to the Company upon reasonable request, subject to confidentiality and legal constraints.

7. Due Diligence Framework

The Company intends to align its due diligence with the OECD Guidance's five-step framework.

7.1 Step 1 — Establish Strong Company Management Systems

The Company will:

- maintain this Policy and communicate it internally and externally;
- integrate conflict minerals considerations into purchasing and supplier management processes;
- maintain a system for collecting and managing supplier declarations and CMRTs;
- maintain a grievance mechanism and escalation process (see Section 10).

7.2 Step 2 — Identify and Assess Risk in the Supply Chain

The Company will:

- conduct an RCOI when required or when requested by customers or regulators;
- evaluate supplier responses for completeness and credibility;
- assess smelter/refiner information (when available) against RMI or equivalent lists of conformant and active smelters/refiners;
- apply risk indicators, including but not limited to:
 - sourcing from CAHRAs;
 - incomplete, inconsistent, or implausible supplier declarations;
 - refusal to provide CMRTs or supporting information;
 - known adverse media, sanctions, or enforcement actions;
 - use of non-conformant or high-risk smelters/refiners.

7.3 Step 3 — Design and Implement a Strategy to Respond to Identified Risks

Where risks are identified, the Company may, depending on severity and leverage:

- request corrective action plans and timelines;
- require updated CMRTs and additional supporting information;



- encourage Suppliers to transition to conformant smelters/refiners;
- increase monitoring frequency;
- collaborate with Suppliers on improvements;
- suspend new business or terminate the Supplier relationship in accordance with contractual rights and applicable law.

7.4 Step 4 — Support Independent Third-Party Audit of Smelter/Refiner Due Diligence

The Company generally relies on industry-led audit programs (including RMI programs) to assess smelter and refiner due diligence where available. The Company does not typically conduct direct audits of smelters/refiners but may request Suppliers to source from smelters/refiners that have been audited or validated as conformant.

7.5 Step 5 — Report Annually on Supply Chain Due Diligence

If the Company is subject to the Conflict Minerals Rule or otherwise determines reporting is appropriate, the Company will prepare and publish the required disclosures, which may include a Conflict Minerals Report and/or information on its website.

8. Product and Supplier Scoping

Because specialty chemical products may include catalysts, pigments, additives, process aids, laboratory materials, packaging, and equipment parts, the Company will use a risk-based approach to scoping, which may include:

- identifying product families or materials most likely to include 3TG (e.g., certain pigments, electronic components in equipment, lab instrumentation parts, filters, and packaging closures);
- focusing on Suppliers that provide:
 - raw materials or intermediates likely to contain 3TG as intentional ingredients, impurities at reportable thresholds, or functional components;
 - packaging or components with metallic parts;
 - equipment, tools, and parts used in manufacturing that may contain 3TG;
- responding to customer inquiries with supplier declarations and material-level information where reasonably available.

9. Contracting and Purchasing Controls

Where appropriate for the Supplier relationship and risk profile, the Company may:

- include conflict minerals representations, cooperation obligations, and flow-down requirements in purchase orders, supply agreements, and/or supplier codes of conduct;
- reserve audit, inspection, and information rights, subject to reasonable confidentiality and security restrictions;
- require notification of material changes in a Supplier's sourcing or smelter/refiner list;
- define remedies for noncompliance, including corrective action requirements, suspension, and termination.



10. Grievance Mechanism and Escalation

The Company encourages employees, Suppliers, and other stakeholders to report concerns related to Conflict Minerals sourcing, including suspected human rights abuses, bribery, illegal taxation, or misrepresentation in supply chain declarations.

Reports may be made through:

- the Company's ethics hotlines:
 - US: 1-844-308-2520
 - UK: 0-808-189-3397
 - France: +33-975182302
 - China: 400-120-4933
 - India: 000-800-0502-106
- web: <https://report.syntrio.com/StandardCustomURL/LHILandingPage.asp>
- mail: Attn: Chase Corporation – Law Department at 375 University Ave, Westwood, MA 02090

The Company will review reports promptly, maintain confidentiality to the extent reasonably possible, and prohibit retaliation against individuals who raise concerns in good faith.

11. Recordkeeping

The Company will maintain records related to its conflict minerals program—including supplier CMRTs, communications, risk assessments, and mitigation actions—for at least Six (6) years, or longer if required by law or internal policy.

12. Public Statements and Customer Requests

The Company may publish this Policy on its website and may provide conflict minerals declarations to customers and other parties with whom the Company has a contractual relationship, or where there is a legitimate business or legal reason to do so. The Company does not provide conflict minerals information in response to unsolicited or random requests.

13. Noncompliance

Failure by Company personnel to follow this Policy may result in disciplinary action up to and including termination of employment, subject to applicable law. Supplier noncompliance may result in corrective actions, suspension of purchases, or termination, consistent with contractual terms.

14. Review and Updates

The Company will review this Policy at least annually and update it as necessary to reflect changes in law, industry standards, and Company operations.

15. Contact

Questions about this Policy or the Company's conflict minerals program should be directed to: lawdepartment@chasecorp.com