



# POLICY

<b>Approver:</b>	Senior Vice President, General Counsel and Secretary
<b>Owner:</b>	Luke E. Alverson
<b>Contact:</b>	Luke E. Alverson
<b>Audience:</b>	All CSWI Associates
<b>Revised:</b>	December 31, 2017

## Conflict Minerals

### Policy Statement

CSW Industrials, Inc. (the "Company") strives to conduct its business with integrity and according to the highest standards of ethical conduct. Throughout our operations, these values drive how we treat each other, our customers, suppliers, and even our competitors. As a result, our ethical business culture supports global efforts to assist in the eradication of Human Rights abuses in the Democratic Republic of Congo (DRC) and adjoining countries, where the mining of certain minerals has partially financed the long standing conflict in this region.

The U.S. Securities and Exchange Commission (SEC) adopted rules to implement reporting and disclosure requirements related to "conflict minerals," as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers (such as the Company) who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain "Conflict Minerals" (identified below) sourced from "Covered Countries" (identified below) that are necessary to the functionality or production of those products.

- "Conflict Minerals" currently refer to gold, tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold.
- The "Covered Countries" include: Democratic Republic of Congo, Central African Republic, Sudan, Zambia, Angola, Congo Republic, Tanzania, Burundi, Rwanda, and Uganda.

The Company supports the objectives and intent of this Conflict Minerals legislation and will fulfill its SEC reporting requirements. Additionally, we are committed to working toward a conflict free supply chain by implementing a management program integrated with our policies and processes to align our worldwide suppliers with this policy. Our Conflict Minerals program will be addressed in our Code of Business Conduct and in our terms and conditions with suppliers

The Company will not knowingly procure raw Conflict Minerals from Covered Countries that are not deemed "conflict free" from mines, smelters, and refiners that produce the minerals used in our products. The Company will perform reasonable due diligence to document that Conflict Minerals used in the materials and components supplied to the Company are procured from outside the Covered Countries, or if they originate from the Covered Countries, that they are certified as "conflict free".

The Company is committed to educating our employees and our suppliers to ensure improved visibility in regards to the origin of the minerals and compliance by not knowingly sourcing Conflict Minerals from Covered Countries that are not deemed "conflict free". If we discover that the use of any of these Conflict Minerals by the Company is found to originate from the Covered Countries, from sources that are not deemed "conflict free", we will take actions to transition toward a conflict free status. Given the complexity and variety of our product offering and global supply chain, we understand that this will and take time, but we are committed to meeting this goal.

### REVISION HISTORY

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