Herbert E. Orr's Conflict Minerals Sourcing Policy

H.E. Orr Company is committed to ethical business conduct and responsible sourcing. We are working diligently with our supply chain partners to ensure compliance with the U.S. Securities and Exchange Commission's rule on conflict minerals.

Consistent with our commitment to social responsibility and sustainability, we expect each of our suppliers to:

- Conduct due diligence on its supply chain in accordance with the Organization for Economic Co-Operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Determine the source of any conflict minerals or products containing conflict minerals that are supplied to us.
- Provide the conflict minerals source information that is necessary to support our due diligence and reporting obligations under the SEC's <u>Conflict Minerals rules</u>.
- Notify us if a supplied product contains conflict minerals originating in the Democratic Republic of Congo (DRC) or surrounding countries.

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