



The Shepherd Color Company
We Brighten Lives

CONFLICT AND ARTISANAL MINERALS SOURCING POLICY

CONFLICT MINERALS

Conflict Minerals are columbite-tantalite (coltan), cassiterite, wolframite and gold, or their derivatives, which are currently limited to tantalum, tin, and tungsten, regardless of their source. Conflict Minerals originating from the Democratic Republic of the Congo (DRC) and certain adjoining countries are sometimes mined and sold by armed groups to finance unfair labor practices or human rights violations. Some of these minerals and/or derivatives can make their way into the supply chains of products used around the world.

In keeping with our core values, it is the policy of The Shepherd Color Company (Shepherd Color) to refrain from purchasing Conflict Minerals from the DRC and adjoining countries. In addition, Shepherd Color seeks to ensure that its raw material supply chains are free of DRC Conflict Minerals.

In support of this sourcing policy, Shepherd Color will:

- i. Exercise due diligence with relevant suppliers to ensure that they, and their supply chains, do not source DRC Conflict Minerals.
- ii. Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm that the products in our supply chain do not support conflict.
- iii. Seek alternative sources for raw materials whose suppliers cannot or will not comply with this policy.
- iv. Discontinue sourcing from non-compliant suppliers where an alternate source is viable.
- v. Commit to transparency in the implementation of this policy by making information available at the request of our customers and relevant stakeholders.

ARTISANAL MINERALS

Artisanal mining, or small scale mining, supports a subsistence way of life, particularly for citizens of developing countries. Some artisanal mining is connected to child and forced labor practices, environmental violations, and other human rights infractions for the purpose of extracting valuable minerals (i.e. cobalt or other metal-containing ores) and/or their derivatives from the earth – often from the same regions of the DRC. It is Shepherd Color's policy to exercise the same level of due diligence regarding artisanal minerals sourcing as it does with conflict minerals sourcing. To that end, Shepherd Color will obtain assurances from its suppliers that artisanal mined minerals, or derivatives thereof, do not enter our supply chain when involving labor, environmental, or human rights violations.