

HAYNES **International**

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Conflicts Minerals Policy

Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas Policy

Recognizing the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that Haynes International, Inc. (the "Company") has the responsibility to respect human rights and avoid contributing to conflict, the Company hereby adopts and will widely disseminate this policy on responsible sourcing of tin, tantalum, tungsten and gold ("conflict minerals") from conflict-affected and high-risk areas. The Company commits to refraining from any action which contributes to the financing of conflict and commits to complying with relevant United Nations sanctions, resolutions or, where applicable, domestic laws implementing such resolutions.

I. Serious abuses associated with the extraction, transport or trade of conflict minerals:

1. If sourcing from, or operating in, conflict-affected and high-risk areas, the Company will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- i)* any forms of torture, cruel, inhuman or degrading treatment;
- ii)* any forms of forced or compulsory labor, which means work or service which is exacted from any person under the threat of penalty and for which such person has not offered himself voluntarily;
- iii)* illegal child labor;
- iv)* other human rights violations and abuses; or
- v)* war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

2. The Company will immediately suspend or discontinue engagement with suppliers where the Company identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

II. Direct or indirect support to non-state armed groups:

1. The Company will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of conflict minerals.

"Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of conflict minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:¹

- i) illegally control mine sites or otherwise control transportation routes, points where conflict minerals are traded or other actors in the supply chain;²
- ii) illegally tax or extort money or conflict minerals at points of access to mine sites, along transportation routes or at points where conflict minerals are traded; or
- iii) illegally tax or extort intermediaries, export companies or international traders.

2. The Company will immediately suspend or discontinue engagement with a supplier if the Company identifies a reasonable risk that the supplier is sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 1.

¹"Affiliates" includes negotiants, consolidators, intermediaries and others in the supply chain that work directly with armed groups to facilitate the extraction, trade or handling of conflict minerals.

²"Control" of mines, transportation routes, points where conflict minerals are traded or upstream actors in the supply chain means (i) overseeing extraction, including by granting access to mine sites and/or coordinating downstream sales to intermediaries, export companies or international traders; ii) making recourse to any forms of forced or compulsory labor to mine, transport, trade or sell conflict minerals; or iii) acting as a director or officer of, or holding beneficial or other ownership interests in, other companies or mines.

III. Public or private security forces:

1. The Company will not directly or indirectly support public or private security forces who illegally control mine sites, transportation routes or other actors in the supply chain, illegally tax or extort money or conflict minerals at point of access to mine sites, along transportation routes or at points where conflict minerals are traded or illegally tax or extort intermediaries, export companies or international traders.

2. The Company recognizes that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

3. "Direct or indirect support" does not refer to legally required forms of support, including legal taxes, fees, and/or royalties that companies pay to the government of a country in which they operate.

4. In the event the Company determines that a supplier has provided direct or indirect support to public or private security forces identified herein, the Company will suspend or discontinue engagement with that supplier after failed attempts at mitigation.

IV. Payment of taxes, fees and royalties due to governments:

The Company will ensure that all taxes, fees and royalties related to mineral extraction, trade or export from conflict-affected and high-risk areas are paid to governments.

V. Procedures:

1. The Company will notify suppliers of conflict minerals about the laws and regulations relating to conflict minerals and the Company's procedures for compliance.

2. The Company will include language in each purchase order sent to a supplier of conflict minerals which will confirm that the product supplied pursuant to the relevant purchase order does not contain conflict minerals, was not sourced from the Democratic Republic of Congo or any of the surrounding countries or was from scrap or recycled sources. The Company's purchase order provides for audit rights, and the Company may periodically audit suppliers for compliance with the conflict minerals law and regulations.

3. The Company will obtain certification from each supplier of conflict minerals annually that the product supplied does not contain conflict minerals, was not sourced from the Democratic Republic of Congo or any of the surrounding countries or was from scrap or recycled sources.

4. Annually, the Company will obtain completed copies of the Conflict Minerals Reporting Template published by the Conflict Free Sourcing Initiative from each supplier of conflict minerals.

5. The Company may utilize a nationally-recognized service to track its and its suppliers' compliance with the conflict minerals laws and regulations.

6. Any person, whether or not employed by the Company, may report a suspected violation of this policy through the Company's whistleblower hotline at www.ethicspiont.com or call 1-866-294-9323.

Effective Date: 01/31/2013 **Revision Date:** 11/05/2015 **Revision No:** 002