

# CONFLICT MINERALS POLICY OF DXP ENTERPRISES, INC.

## Policy Statement on Conflict Minerals

As a socially responsible company, DXP Enterprises, Inc. (“DXP”) complies with laws and regulations, conducts business fairly and ethically, follows a Code of Conduct and respects human rights.

DXP is subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Section 1502”), which aims to prevent the use of “Conflict Minerals” that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries (as defined in the Act). DXP supports the intent and efforts of this Act.

“Conflict Minerals” currently include: tantalum, tin, tungsten and gold, also referred to as “3TG”. It is important to note that the US government’s definition of the term *Conflict Minerals* encompasses the four ores/metals **even where they do not actually contribute to the financing or benefit of armed groups**. Therefore, DXP differentiates between conflict minerals and conflict minerals that directly or indirectly finance or benefit armed groups in the DRC/adjoining countries.

DXP is developing systems to avoid the use of Conflict Minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.

DXP is committed to complying with the reporting obligations required under Section 1502 and SEC regulations. Therefore, DXP is conducting inquiries into the source of 3TG in its products and is establishing compliance requirements for our direct suppliers. In addition, customers will be provided data as requested.

## Expectations for Suppliers

In support of DXP’s policy on Conflict Minerals, DXP will survey its direct suppliers.

Suppliers are expected to provide requested information concerning Conflict Minerals in a timely manner and with full disclosure. DXP reserves the right to request additional documentation from our suppliers regarding the source of 3TG included in DXP’S products. Supplier must maintain and provide to DXP, upon request, traceability data.

Suppliers are encouraged to adopt policies and management systems and to require their suppliers to adopt similar policies and systems with respect to Conflict Minerals.

DXP will be integrating 3TG information verification as part of our existing supplier engagement/review processes. DXP will assess suppliers who do not conform to DXP’s policy on Conflict Minerals and will take any appropriate actions up to and including terminating supplier relationships based on non-conformance.

For concerns regarding potential violations of DXP’s Conflict Minerals Policy please contact DXP’s third party anonymous helpline at (888) 307-4398 or make an anonymous report at [dxpe.ethicspoint.com](http://dxpe.ethicspoint.com).