

Conflict Minerals Policy (“**Policy**”)

Funds generated from the mining of certain minerals (“**Conflict Minerals**”) from the Democratic Republic of the Congo (“**DRC**”) and surrounding countries have been associated with human rights violations through the funding of illegal armed forces. These Conflict Minerals include, tin, tantalum, tungsten and or gold (“**3TG**”). In response, the U.S. Securities and Exchange Commission (“**SEC**”) adopted Rule 13p-1 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“**Dodd-Frank Act**”) that requires publicly traded companies to annually disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals that are necessary to the functionality or production of its products. The requirements under the Dodd-Frank Act promote increased supply chain transparency (“**Transparency**”) to identify the use of Conflict Minerals that may have directly or indirectly funded violence, abuse and or criminal activity against innocent civilians.

Blount International, Inc. (“**Blount**”) is committed to establishing Transparency to identify any Conflict Minerals that may be linked to human rights violations. In support of this commitment, Blount will:

1. Implement a recognized diligence framework such as the Organisation for Economic Co-operation and Development Guidance (“**OECD Guidance**”)¹.
2. Solicit and collect product-level information utilizing the Electronic Industry Citizenship Coalition® (“**EICC**”) and the Global e-Sustainability Initiative (“**GeSI**”) Conflict Mineral Reporting Template (“**CMRT**”) to confirm the existence of Conflict Minerals.
3. Conduct a Reasonable Country of Origin Inquiry (“**RCOI**”) of Conflict Minerals identified by suppliers.
4. Implement a color-coded due diligence and risk assessment to prioritize additional inquiry efforts: (i) Red—high risk (smelter or refiner not conflict free or no response from supplier); (ii) Yellow—medium risk (3TG and or source unknown); and (iii) Green—conflict free or no 3TG.
5. Maintain a system of record to capture due diligence efforts.
6. Conduct an annual review of the Policy and due diligence efforts to improve reporting efforts, if necessary.

Blount’s Expectations of Suppliers

Blount recognizes supplier engagement is an essential element to achieve its Policy. With that said, Blount’s suppliers are expected to support this Policy by following the below requirements and or acknowledgements:

1. Accept the terms and agree to comply with Blount’s Supplier Code of Conduct.
2. Adopt and adhere to a recognized due diligence framework with adequate procedures to assess and monitor supply chain transparency (e.g., OECD Guidance).
3. Use reasonable efforts to source from known conflict-free smelters and or refiners.
4. Comply with Blount’s requests to disclose product-level sourcing information including, but not limited to, origin of Conflict Minerals and smelters.
5. Maintain reasonable recordkeeping for a period of five (5) years to support disclosures.

Non-Compliance

Blount will work with suppliers on a case-by-case basis to develop an appropriate action plan to eliminate Conflict Minerals.

Grievance and Reporting Violations

Any concerns and potential or actual misconduct that violate this Conflict Minerals Policy may be reported to Blount’s General Counsel at (001-503-653-4226). Blount values its supplier relationships and encourages, respects, and appreciates supplier input.

¹OECD (2013), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Second Edition, OECD Publishing. <http://dx.doi.org/10.1787/9789264185050-en>