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CONFLICT MINERALS POLICY

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and related Securities and Exchange Commission (“SEC”) rules are designed to limit the flow of funds from the production of conflict minerals to armed groups in the Democratic Republic of the Congo (“DRC”) and adjoining countries. Conflict minerals mean cassiterite, columbite-tantalite, also known as coltan, gold, wolframite and specified derivatives (currently, tin, tantalum and tungsten). The SEC rules require Olin Corporation (“Olin”) and other publicly reporting manufacturers to disclose whether the products they manufacture or contract to manufacture contain conflict minerals that are necessary to the functionality or production of those products. Conflict minerals are used in the manufacture of a variety of commercial products, including some of Olin’s ammunition and related products.

Olin implemented a due diligence process to determine the source of conflict minerals included in any of its products, so that Olin can make the required disclosures of its findings in a filing with the SEC and respond to information requests from its customers regarding Olin’s use of conflict minerals.

Olin requires suppliers of conflict minerals to provide reasonable assistance in determining the sources of those minerals, and encourages the suppliers to adopt a due diligence process in accordance with the OECD Due Diligence Guidance for a Responsible Global Supply Chain of Conflict Minerals from Conflict-Affected and High-Risk Areas, and take actions towards sourcing responsibly. According to our purchasing contractual agreement, if applicable to the supplier, supplier commits to comply with the Conflict Minerals Provision and its implementing regulations, as they may be amended over time. In addition, the supplier agrees to cooperate with Olin by providing all necessary information in connection with all reasonable country of origin inquiry, and due diligence as necessary, with regard to products supplied to Olin which contain conflict minerals.

Olin is committed toward avoiding the use, within its supply chain, of conflict minerals that finance or benefit armed groups in the DRC region. To the extent a supplier cannot or will not adhere to this policy, Olin intends to limit purchases from such supplier to the extent practicable or seek alternative suppliers where commercially feasible.