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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.22
May 11, 2022

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Swagelok Company including ALL Swagelok distributorships
Declaration Scope or Class (*):	A. Company
Description of Scope:	Covering Swagelok Products
Company Unique ID:	00-418-5906
Company Unique ID Authority:	United States Employment Identification Number (EIN)
Address:	29500 Solon Road, Solon Ohio 44139 USA
Contact Name (*):	Jonathan Seewald
Email - Contact (*):	Jonathan.Seewald@Swagelok.com
Phone - Contact (*):	440-649-5267
Authorizer (*):	Steve Volcansek
Title - Authorizer:	Manager, Corporate Product Compliance
Email - Authorizer (*):	Steven.Volcansek@Swagelok.com
Phone - Authorizer:	440-649-5626
Effective Date (*):	1-Jun-2022

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum (*)	Yes	Tantalum is used on Tantalum fitting body products
Tin	No	
Gold	No	
Tungsten (*)	Yes	For Swagelok® weld heads with tungsten electrodes. Also, the Integral Bonnet, GU series Needle Valves, and 4P / 5P Rising Plug Valves contain Tungsten-disulfide as a lubricant.

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum (*)	Yes	Tantalum is used on Tantalum fitting body products
Tin		
Gold		
Tungsten (*)	Yes	For Swagelok® weld heads with tungsten electrodes. Also, the Integral Bonnet, GU series Needle Valves, and 4P / 5P Rising Plug Valves contain Tungsten-disulfide as a lubricant.

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum (*)	Unknown	All stock and current purchases of Tantalum or materials containing Tantalum have this ore sourced from a RMI-approved smelter. In most cases, the ore will be sourced from outside the covered countries, but some could potentially be sourced within the DRC region. In either case, these smelters have been approved by RMI, thus showing appropriate due diligence is taken to ensure human rights violations are not occurring.
Tin		
Gold		
Tungsten (*)	Unknown	All stock and current purchases of Tungsten or materials containing Tungsten have this ore sourced from a RMI-approved smelter. In most cases, the ore will be sourced from outside the covered countries, but some could potentially be sourced within the DRC region. In either case, these smelters have been approved by RMI, thus showing appropriate due diligence is taken to ensure human rights violations are not occurring.

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum (*)	No	Current inventories of Tantalum barstock and forgings at Swagelok are compliant. They were either purchased prior to Dodd-Frank, or are certified as Conflict Free with the smelters identified (please see smelter list included in this CMRT). All future procurements will be compliant due to specification and Purchase order requirements.
Tin		
Gold		
Tungsten (*)	No	

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum (*)	No	
Tin		
Gold		
Tungsten (*)	No	

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments



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Tantalum (*)	100%	Current inventories of Tantalum barstock and forgings at Swagelok are compliant. They were either purchased prior to Dodd-Frank, or are certified as Conflict Free with the smelters identified (please see smelter list included in this CMRT). All future procurements will be compliant due to specification and Purchase order requirements.
Tin		
Gold		
Tungsten (*)	100%	Swagelok has one supplier of Tungsten electrodes and one supplier of Tungsten Disulfide lubricant. We received verification from these manufacturers that tungsten used is conflict-free (please see smelter list included in this CMRT).

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)

	Answer	Comments
Tantalum (*)	Yes	
Tin		
Gold		
Tungsten (*)	Yes	



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8) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum (*)	Yes	
Tin		
Gold		
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	Swagelok corporate technical letter regarding conflict minerals Dodd-Frank, Swagelok's Supplier Code of Ethics (Swagelok Catalog CORP-0072.PDF)
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	Yes, http://www.swagelok.com/downloads/WebCatalogs/EN/CORP-0072.PDF
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	This is part of our Supplier Code of Ethics, and is being incorporated into our primary Corporate requirements for procured materials
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., C	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
G. Does your review process include corrective action management? (*)	Yes	This is a standard part of our supplier auditing process, and would be pursued for any identified nonconformities
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	Swagelok is a privately held firm, but voluntarily adheres and complies to Dodd-Frank Conflict Minerals.