



Conflict Minerals Policy Statement

Background on the Conflict Minerals Rule

In August 2012, the U.S. Securities and Exchange Commission (the “SEC”) issued a rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act that requires all publicly-traded companies to disclose their use of -tin, tungsten, tantalum and gold (the “Conflict Minerals”) if those minerals are necessary to the functionality or production of a product manufactured by the company. Those publicly-traded companies must inquire into the origin of the Conflict Minerals and, if it determined that the Conflict Minerals may have originated in the Democratic Republic of Congo or its adjoining countries (collectively, “the Covered Countries”) and are not from scrap or recycled sources, they must perform additional due diligence to determine whether the sourcing of the Conflict Minerals could have provided funding for armed groups responsible for human rights violations in the Covered Countries.

AZZ’s Conflict Minerals Policy

AZZ Inc. (“AZZ”) and all of its subsidiaries are committed to the responsible sourcing of minerals worldwide. Though we do not currently source Conflict Minerals directly from smelters or refiners, we endeavor to purchase only conflict-free products from our suppliers. To that end, we have taken a number of steps that include:

- ▶ Establishing a conflict minerals compliance program supported by an internal cross-functional team that reports to AZZ’s Chief Legal Officer;
- ▶ Surveying relevant suppliers on an annual basis regarding the presence and source of any Conflict Minerals contained in the products supplied to AZZ; and
- ▶ Developing a process to identify and assess risks in the supply chain and take corrective action when necessary.

We expect that our direct suppliers will also exercise due diligence to investigate the presence and source of any Conflict Minerals in their supply chains. If it is discovered that any of the Conflict Minerals we source are not conflict-free, we will take actions to transition toward conflict-free status.

Any concerns regarding AZZ’s compliance with the SEC’s conflict minerals rule may be reported to AZZ’s Chief Legal Officer via our Compliance Hotline: <https://azz.alertline.com>.

This policy statement on Conflict Minerals will be regularly reviewed and updated as necessary.
