

DXP ENTERPRISES, INC.

CONFLICT MINERALS POLICY

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) addresses the exploitation and trade of certain minerals which contribute to violence and human rights abuses in the Democratic Republic of the Congo and its adjoining countries (collectively “the Covered Countries”). The minerals are gold, columbite-tantalite (coltan), cassiterite, and wolframite, including their derivatives tantalum, tin, and tungsten (“Conflict Minerals”). DXP Enterprises, Inc. (“DXP”) fully supports the Dodd-Frank Act’s goal of preventing armed groups in the Covered Countries from benefitting the sourcing of Conflict Minerals from that region.

As part of the DXP’s continuing efforts to fully comply with the Dodd-Frank Act, DXP will:

1. Identify any Conflict Minerals in the products we manufacture or contract to manufacture;
2. Annually improve the tracking of Conflict Minerals in our supply chain and the reporting on the countries of origin;
3. Support initiatives to audit smelters and refiners of Conflict Minerals;
4. Provide information to our customers regarding the compliance of our applicable products; and
5. Engage a third party service provider to assist us with Conflict Minerals compliance.

DXP has the following expectations of our suppliers and their suppliers:

1. Suppliers should develop policies, procedures, due diligence processes and management systems that are reasonably designed to prevent products or materials that are not free from Conflict Minerals from entering DXP’s supply chain;
2. Suppliers are expected to identify the steps in their supply chain through which Conflict Minerals are introduced, and to undertake the due diligence efforts necessary to identify the smelter, refiner and/or mine from which Conflict Minerals originate, including requiring direct suppliers to DXP to cooperate in diligence efforts and to provide any information necessary to facilitate our compliance efforts;
3. Use reasonable efforts to source Conflict Minerals from smelters and refiners that have been validated by a recognized, independent third party; and
4. Advise DXP as promptly as possible of any determination if any products or materials in the supply chain are not free of Conflict Minerals.

DXP reserves the right to access the supplier relationship and to take any appropriate action if the supplier fails to comply with the DXP’s Conflict Mineral Policy.

For concerns regarding potential violations of DXP’s Conflict Mineral Policy please contact DXP’s anonymous third party conduct helpline at (888) 307-4308 or make an anonymous report at dxpe.ethicspoint.com.