

Conflict Minerals Policy

Concern that the profits from the sale of cassiterite, columbite-tantalite (coltan), wolframite (including their derivatives, tantalum, tin, and tungsten), and gold (collectively, the “**Conflict Minerals**”) from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively, the “**Covered Countries**”) were financing violence and human rights abuses in the Covered Countries led the United States Congress to enact Section 1502(b) of the Dodd-Frank Wall Street Reform and Consumer Protection Act. As required by Section 1502(b), the Securities and Exchange Commission (the “**SEC**”) adopted a rule requiring public companies to annually disclose information about whether the products they manufacture or contract to manufacture that contain necessary Conflict Minerals originate from the Covered Countries, and, if so, disclose information about the source and chain of custody of those Conflict Minerals (the “**Conflict Minerals Rule**”).

Compass Group Diversified Holdings LLC and Compass Diversified Holdings (collectively, “**CODI**”) support the efforts to further the humanitarian goal of ending violence in the Democratic Republic of the Congo.

CODI and its various subsidiaries are committed to complying with the Conflict Minerals Rule. As an owner of downstream companies that are removed from the mining of Conflict Minerals, CODI relies on the information provided by its suppliers and other third-parties. CODI expects that all of its subsidiaries’ suppliers will provide all necessary information using the Conflict Free Sourcing Initiative (CFSI) Conflict Minerals Reporting Template to facilitate CODI’s disclosure as required by the Conflict Minerals Rule. CODI used information included on the CFSI website to determine whether any Conflict Minerals that may be contained in its subsidiaries’ products finance or benefit armed groups in the Covered Countries.

CODI is committed to taking proactive measures to ensure that the Conflict Minerals in its subsidiaries’ products do not directly or indirectly finance or benefit armed groups in the Covered Countries (“**DRC Conflict-Free**”). CODI evaluates the information provided by its subsidiaries’ suppliers and to the extent those responses indicate a risk that such materials or products supplied are not DRC Conflict Free, CODI’s executive management reserves the right to evaluate the supplier relationship and to take any appropriate action, including terminating CODI’s relationship with the supplier.