



Corporate Policy 26.1.1
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Sponsor: General Counsel

CONFLICT MINERALS POLICY

At Stepan Company (collectively with its subsidiaries, “Stepan”), we are committed to the highest ethical standards and compliance with the law. As part of this commitment, it is Stepan’s policy to responsibly source minerals and to work with suppliers to ensure compliance with relevant diligence and disclosure requirements relating to Conflict Minerals. Further, we adhere to internal due diligence procedures and controls with respect to Conflict Minerals. If our products contain Conflict Minerals that are necessary to the functionality of such products, then our policy is to conduct a reasonable country of origin inquiry to determine whether such Conflict Minerals come from the Democratic Republic of the Congo or one of the adjoining countries, or from recycled or scrap sources.

Definition of Conflict Minerals

Conflict Minerals are columbite-tantalite (coltan), cassiterite, gold, wolframite, tantalum, tin and tungsten.

Expectations of Suppliers

Stepan does not purchase Conflict Minerals directly from smelters or mines and there are many third parties in the supply chain between Stepan and the original sources of Conflict Minerals. Stepan relies on its suppliers to identify the sources of Conflict Minerals. Stepan expects each of its suppliers to:

- Identify any Conflict Minerals supplied to Stepan or contained in products supplied Stepan;
- Conduct a reasonable inquiry into the country of origin of Conflict Minerals incorporated into products it provides Stepan, if any;
- Conduct appropriate due diligence on its supply chains in accordance with industry standards and this Policy;
- Institute risk assessment and mitigation actions necessary to implement such country of origin inquiry and due diligence procedures; and
- Provide information reasonably requested by Stepan that is necessary for Stepan to fulfill its own due diligence and disclosure obligations.

Stepan may terminate its business relationships with suppliers that fail to comply with this Policy.

