

INNOSPEC INC. CONFLICT MINERALS POLICY

1. Introduction

The US and EU have passed laws (“**Conflict Minerals Laws**”) which operate to stem the trade in certain metals, namely columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, tantalum, tin and tungsten (“**Conflict Minerals**”), which finance armed conflict or are mined using forced labour.

The Conflict Minerals Laws focus on countries and areas whose natural resources include Conflict Minerals and that are conflict affected, or have weak or non-existent governance and security, or widespread systematic violations of international law including human rights abuses. Such territories include the Democratic Republic of Congo, Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda (“**Covered Countries**”) as well as other territories considered by the applicable authorities to be high risk.

Innospec Inc., including all its subsidiaries and affiliated companies (“**Innospec**”), is committed to complying with the Conflict Minerals Laws, and has set out its expectations in its Code of Conduct, available at <https://innospec.com/about-us/corporate-governance/>, and adopted this Conflict Minerals Policy (the “**Policy**”) in furtherance of that commitment.

2. Supply Chain Expectations

a. Supplier Code of Conduct

As also set out in Innospec’s Supplier Code of Conduct, Innospec expects its suppliers to share Innospec’s commitment to responsible sourcing, by supplying materials, products and components that are conflict free and requiring their own suppliers to adopt similar policies, systems and socially responsible sourcing practices. Suppliers are also expected to respond to Innospec’s enquiries and provide certification supporting their commitment to being or becoming conflict free, and documenting country of origin for Conflict Minerals that they purchase. Innospec’s Supplier Code of Conduct is available at the following link <https://innospec.com/about-us/supplier-relations/>.

b. Information Requests to Suppliers

Innospec expects its raw material, chemical and component suppliers to promptly provide a completed CMRT upon request. The CMRT is a free, standardized reporting template available at <http://responsiblemineralsinitiative.org/conflict-minerals-reporting-template/> that asks for relevant information about the content and source of materials. If required, Innospec’s Legal Compliance

department (“**Legal Compliance**”) will issue a CMRT for completion, either directly to the supplier or to the relevant Innospec manager for onward issue to the supplier.

c. Due Diligence Measures on Tracing and Sourcing New Materials

Where Innospec directly purchases Conflict Minerals, or products containing Conflict Minerals or their derivatives, Innospec expects its relevant suppliers to commit to the responsible, conflict-free sourcing of those minerals. Innospec suppliers are expected to have a policy in place to achieve conflict-free supply chains and must be willing to certify as an express condition to Innospec’s purchase that the minerals supplied are conflict free (i.e., that the minerals did not originate in a Covered Country or other identified high risk territory, or that they came from recycled or scrap sources).

3. Annual Conflict Minerals Assessment and Statement

Innospec’s Legal Compliance team oversees an annual review to determine whether Conflict Minerals were “necessary to the functionality or production” of any products that Innospec manufactured, contracted to manufacture, sold or supplied during the prior calendar year. The review also determines whether Conflict Minerals were imported by Innospec into the EU during the prior calendar year and, where relevant, if they were sourced responsibly and not from conflict affected or high risk areas. Innospec’s annual Conflict Minerals Statement is published on its corporate website (see the Conflict Minerals section at <https://innospec.com/about-us/supplier-relations/>).

Where required, external sources, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, are consulted to determine whether additional due diligence is appropriate.

4. Conflict Minerals Queries

All enquiries regarding Conflict Minerals, including any requests from customers for Innospec to complete a Conflict Minerals Reporting Template (“CMRT”) or otherwise confirm or certify that any of the products Innospec manufactures or supplies are free of Conflict Minerals (or that any Conflict Mineral content has been responsibly sourced), should be directed to Innospec’s Legal Compliance team at (ConflictMineralsGroup@Innospecinc.com).