As a public company, Barnes Group is subject to U.S. securities laws and regulations, in addition to various other federal, state, and local laws and regulations. In July 2010, the Dodd-Frank Financial Reform Bill became law, requiring all U.S. public companies to disclose use of conflict minerals that are necessary to the functionality or production of products that they manufacture. Conflict minerals are tin, tantalum, tungsten, gold and their derivatives which are mined in the Democratic Republic of the Congo and adjacent countries (DRC region) and where revenues from the sale of such minerals may be financing armed groups engaged in civil war and certain other social and environmental abuses.

Barnes Group supports the social goals underlying the legislation and commits to the following:

1. To use internationally recognized due diligence standards to understand and manage the Barnes Group supply chain for the purpose of reducing the risk that conflict minerals are present in products that Barnes Group manufactures.

2. To not knowingly source conflict minerals that support armed groups in the DRC region.

3. To require suppliers to undertake reasonable due diligence of their supply chains to ensure that they do not use conflict minerals that support armed groups in the DRC region.

4. When aware of supplier non-compliance, to implement corrective actions that may include reassessment of the supplier relationship.