



COMPX INTERNATIONAL INC

Statement on Conflict Minerals

May 8, 2017

We are committed to complying with the requirements set forth in the final rule regarding the use of “Conflict Minerals” under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the related rules, regulations and interpretations issued by the U.S. Securities and Exchange Commission (“SEC”). These rules, regulations and interpretations require us to perform a reasonable country of origin supply chain inquiry to identify the extent to which our products contain tin (cassiterite), tungsten (wolframite), tantalum (columbite-tantalite or coltan) or gold that are necessary to the production or functionality of our products and originate from the Democratic Republic of Congo and its adjoining countries (collectively, “*Conflict Minerals*”).

In order to comply with the applicable rules, regulations and interpretations, CompX commits to:

- Identify the presence of Conflict Minerals in our supply chain, if any;
- Develop repeatable processes to determine the origin of our Conflict Minerals;
- Perform a series of supplier inquiries to ensure the sourcing of minerals within our supply chain;
- Educate our suppliers with respect to the SEC reporting requirements related to Conflict Minerals; and
- Prepare appropriate disclosure for CompX’s SEC filings on the due diligence performed regarding Conflict Minerals, if required

In addition to the foregoing commitments, we expect our suppliers to perform similar due diligence on the sources of Conflict Minerals in their respective supply chains and make their findings available to us.

If we determine that our products contain Conflict Minerals, we will make the appropriate disclosures.