



CIRCOR INTERNATIONAL, INC.

POLICY FOR A RESPONSIBLE GLOBAL SUPPLY CHAIN

Background

Circor International, Inc. ("we" or the "Company") depends on complex global supply chains for procurement of materials used in producing its products. The Company's subsidiaries operate production facilities in Europe, Asia and the Americas. Each of these subsidiaries does business with numerous direct suppliers who in turn acquire materials from a broad range of upstream vendors. Circor recognizes the risk that the reach of its supply chains may extend to one or more upstream vendors who have links to sources located in areas of political and military conflict or connected to persons engaged in human rights abuses. The Company is committed to developing greater transparency in its supply chain and to promoting high ethical standards among its suppliers. The Company is also committed to complying with laws and regulations aimed at promoting these goals.

In central Africa, rebel groups are known to have seized control of certain mineral mines and used the proceeds of mining operations to finance a revolution which has resulted in widespread human rights abuses against local populations in the Democratic Republic of Congo and its bordering nations (together, the "DRC Region"). U.S. law requires publicly traded companies to undertake efforts to determine the extent to which their products contain certain minerals, i.e., tin, tantalum, tungsten and gold ("Conflict Minerals") mined from the DRC Region. Under implementing regulations, the Company is required to conduct due diligence on its supply chain for Conflict Minerals and disclose its findings in a public filing with the Securities Exchange Commission. Other jurisdictions have also promulgated laws requiring transparency in supply chains with respect to other human rights issues, e.g., human trafficking.

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Accordingly, the Company has adopted this policy statement on responsible sourcing of materials from certain conflict-affected and high-risk areas. We commit to undertake an examination of our supply chain activities with the goal of ensuring greater transparency, including the elimination of any linkage that we may identify to persons or groups engaged in human rights abuses.

Policy Statement

Circor recognizes that there are serious human rights abuses associated with the extraction, transport and trade of Conflict Minerals from the DRC Region. The Company will undertake efforts to manage the risk that its products may contain Conflict Minerals. We will adhere to the following procedures to determine whether such Conflict Minerals are used in the production of our products.

1. We will review our products to identify any items that have a specification or function that requires the use of a Conflict Mineral.
2. We will conduct a reasonable inquiry of our suppliers to confirm or refute our findings and, where confirmed, request our suppliers to identify the Conflict Minerals' country of origin.
3. Where we have reason to believe that a direct material contains a Conflict Mineral directly or indirectly sourced from the DRC Region, the Company will request its direct suppliers of such Conflict Minerals to disclose the identities of their upstream suppliers, with the goal of identifying the smelter (or, for gold, the refiner) and ultimately source mine of the Conflict Mineral.
4. Where the Company discovers evidence indicating the probability that materials provided by a direct supplier contain Conflict Minerals sourced from the DRC Region, the Company will make further inquiry to determine whether its purchase of such materials is benefitting any persons known to be engaged in human rights abuses in the DRC Region.

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5. If the Company determines that its economic activities directly or indirectly benefit such persons and where (i) a supplier refuses to eliminate such persons as a source of such materials, or (ii) the Company determines that the supplier cannot or has not eliminated such sources or materials, the Company will develop alternate sources of the materials and discontinue its relationship with the supplier at its earliest practicable opportunity.

The Company is committed to continuous progress toward making all of its products "Conflict Free." We are equally committed to identifying and eliminating any commercial relationship or other economic activity that directly or indirectly benefits persons or groups engaged in human rights abuses.