



ILLINOIS TOOL WORKS INC. RESPONSIBLE MATERIALS POLICY

We have adopted this conflict minerals policy in support of our commitment to responsible sourcing, compliance with applicable legal requirements and meeting the expectations of our customers. As used in this policy, “conflict minerals” has the meaning given to that term in each of the U.S. Conflict Minerals Rule and the EU Conflict Minerals Regulation (together, the “Regulations”). As set forth in the Regulations, “conflict minerals” includes tin, tantalum, tungsten, and gold generally and as further set forth in the more detailed list of minerals and metals within the scope of the EU Conflict Minerals Regulation (collectively, “3TG”). This policy applies to conflict minerals regardless of where they are sourced, processed or sold.

ITW does not knowingly procure any 3TG that originates from a conflict-affected or high-risk area (a “CAHRA”), unless they are processed by smelters and refiners that are verified or in the process of becoming verified as “conflict free,” “conformant” or the equivalent by an independent third party (collectively referred to as “conflict free”).

Our due diligence processes and efforts conform to the relevant portions of the Organisation for Economic Co-operation and Development’s internationally recognized Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Consistent with the foregoing and the Regulations, we ask our suppliers to undertake due diligence with their supply chains to determine the location from which 3TG is being sourced and whether the smelter or refiner is conflict free. This request is supported by ITW’s [Supplier Code of Conduct](#) and [Terms and Conditions of Purchase](#), which require our suppliers upon request to conduct their own due diligence and provide written documentation as to the origin of the 3TG in their products. In addition, suppliers are expected to maintain policies and procedures that support their due diligence and our expectation that suppliers source responsibly.

If we discover that products procured by us contain 3TG from CAHRAs that is processed by facilities that are not conflict free or in the process of becoming conflict free, we will take steps in conjunction with the supplier to transition the products’ 3TG supply chain to conflict free sources or to seek to use leverage to influence the smelter or refiner to become conflict free. We do not seek to embargo responsibly sourced 3TG from CAHRAs (as doing so could be detrimental to the legitimate economies and populations of those areas). Suppliers are therefore encouraged to continue support of conflict free smelters and refiners and to take similar measures with their supply chains.

The information provided by ITW’s suppliers is used to conduct our due diligence. In addition to assessing supplier information for accuracy, completeness and consistency, we compare the smelter and refiner lists provided by our suppliers with the Responsible Mineral Initiative’s lists of “conformant” and “active” smelters and refiners to determine which facilities are third party-verified or in the process of becoming verified. Information provided by our suppliers is used to inform our risk assessments and risk mitigation activities and in the development of ITW’s Conflict Minerals Report and Form SD filed with the U.S. Securities and Exchange Commission each year and posted on our website.

ITW also maintains a web- and telephone-based reporting system ([Helpline](#)), providing any interested party a confidential reporting mechanism by which they can communicate issues and concerns regarding ITW’s supply chain, including issues and concerns relating to conflict minerals.

E. Scott Santi, Chairman and CEO