

NOV POLICY ON CONFLICT MINERALS

“**Conflict Minerals**” refers to tin, tungsten, tantalum or gold sourced from mines or smelters that have directly or indirectly aided armed groups in the Democratic Republic of Congo or surrounding countries. Many of these militias are responsible for human rights atrocities in the region, including acts of violence towards women and children, forced labor, human trafficking, torture and other war crimes.

As an effort to end these human rights violations, the United States passed a law requiring due diligence into the use of these minerals and an audit of the extent to which payments for these minerals aid such militias. National Oilwell Varco is committed to fully supporting the US Government’s efforts.

NOV’s policy is to develop a “conflict free” supply chain – one that does not use tin, tungsten, tantalum or gold sourced from mines or smelters that have directly or indirectly aided armed groups in the Democratic Republic of Congo or surrounding countries.

This does not mean NOV bans the use of minerals sourced from any mine or smelter in the region as such a policy may harm legitimate miners in the region. NOV encourages its vendors to only use responsible sources in the region.

Internal and external controls will be established to assure compliance with NOV’s policy on Conflict Minerals. NOV will require its vendors to certify the source of their tin, tungsten, tantalum or gold. If the source of such minerals is a mine or smelter in the Democratic Republic of Congo or a surrounding country, NOV will require its vendors to verify that no money has aided an armed group in the region.

NOV’s preference is that its vendors source the minerals only from smelters verified through an internationally recognized certification program. Once such a program is fully developed, NOV will encourage all its vendors to procure the minerals through such a validated supply chain. Until that time, NOV will work with its vendors to audit their supply chain.

As a publicly traded US company, NOV is committed to comply with the Dodd-Frank Act of 2010, its laws with regard to Conflict Minerals, and the implementation guidelines and reporting obligations published by the SEC. We ask our vendors to cooperate with us as we comply with these provisions, and we are committed to our customer’s efforts to do the same. Together, we can ensure a socially and environmentally responsible supply chain.

For more information, or to report a violation of this policy, please contact us at:
conflict.minerals@nov.com.

