



Conflict Minerals Policy



Policy

Company Policy Statement

Hess Corporation and its subsidiaries and affiliates (“Hess” or the “Company”) seeks to avoid the use of minerals in its products that help fund armed groups in the Democratic Republic of Congo (“DRC”) and adjoining countries. To this end, Hess will continue to comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Actⁱ, which imposes specific disclosure requirements on companies that manufacture, or contract to manufacture,ⁱⁱ products containing “Conflict Minerals.” “Conflict Minerals” are defined by statute to include gold; cassiterite and its derivative tin; columbite-tantalite and its derivative tantalum; and wolframite and its derivative tungsten.ⁱⁱⁱ These minerals are necessary to manufacture a wide variety of products, ranging from light bulbs to camera lenses.

If Conflict Minerals are “necessary to the functionality or production”^{iv} of specific products, companies are required to annually disclose to the Securities and Exchange Commission whether those minerals originated in the DRC or the nine (9) adjoining countries,^v (Angola, Burundi, Central Africa Republic, The Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia), and whether the products with these minerals are “DRC conflict free.”^{vi}

Hess manufactures, or contracts to manufacture, very few products containing these minerals. For products that Hess manufactures or contracts to manufacture, Hess has developed due diligence processes and procedures to: (1) identify products and components that are supplied to us that contain the Conflict Minerals covered by the legislation; (2) engage with our suppliers in our supply chain to identify the source of those minerals; and (3) commit to transparency by making available reports on our efforts to relevant stakeholders and the public.^{vii}

Hess suppliers are expected to provide Hess with information regarding the source and chain of custody of any Conflict Mineral contained in products or components provided to Hess. As part of the Hess Conflict Minerals due diligence program, Hess expects our suppliers to utilize the widely-used [Conflict Minerals Reporting Template](#) developed by the [Electronic Industry Citizenship Coalition](#) and the [Global e-Sustainability Initiative](#) and to exercise due diligence with relevant suppliers consistent with the Conflict-Free Sourcing Initiative and encourage their suppliers to also do so.

Recognizing that suppliers are still developing programs and systems necessary to obtain the requested information regarding the source of specific minerals, Hess is committed to working with our suppliers to ensure that all parties are able to comply with the requirements.

Approved by:

Date: July 15, 2015

John B. Hess
Chief Executive Officer



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ⁱ Conflict Minerals, § 1502, Dodd-Frank Wall Street Reform and Consumer Protection Act, , Pub. L. No. 111-203, 124 Stat. 1376 (2010), available at <http://www.gpo.gov/fdsys/pkg/PLAW-111publ203/pdf/PLAW-111publ203.pdf>, pp. 838-843.

ⁱⁱ Companies are required to report on products “manufactured or contracted to be manufactured.” Dodd-Frank Act § 1502 (p)(1)(A)(ii).

ⁱⁱⁱ Dodd-Frank Act § 1502 (e)(4) defines “conflict mineral” as “columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives,” or “any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.” To date, the Secretary of State has not identified any additional minerals.

^{iv} Dodd-Frank Act § 1502 (p)(2) notes that persons covered by the reporting requirement are those required to report to the Securities and Exchange Commission if “conflict minerals are necessary to the functionality of production of a product manufactured by such a person.”

^v Dodd-Frank Act § 1502 (e)(1) defines “adjoining country” to mean “a country that shares an internationally recognized border with the Democratic Republic of the Congo.”

^{vi} Covered companies are required to describe “products manufactured or contracted to be manufactured that are not DRC conflict free (‘DRC conflict free’ is defined to mean the products that do not contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country).” Dodd-Frank Act § 1502 (p)(1)(A)(ii).

^{vii} Covered companies are expected to describe in their report, “the measures taken by the person to exercise due diligence on the source and chain of custody of such minerals.” Dodd-Frank Act § 1502 (p)(1)(A)(i).