

**GRAHAM CORPORATION
CONFLICT MINERALS POLICY STATEMENT**

Adopted: March 25, 2021

Graham Corporation is committed to sourcing components and materials from companies that share our values around human rights and ethics. We support the goal of the Dodd-Frank Act of 2010 to end violence and human rights violations in conjunction with the mining of certain minerals, (the conflict minerals) from areas referred to as the conflict region, primarily located in the Democratic Republic of the Congo and adjoining countries. Minerals defined as conflict minerals consist of gold, tantalum, tin and tungsten.

We attempt to utilize suppliers with products that are conflict free. We undertake due diligence processes and efforts to support our efforts and expect our suppliers to source products and develop reasonable due diligence frameworks and policies designed to prevent conflict minerals from being included in our products.

We file our conflict minerals disclosure on Form SD with the Securities and Exchange Commission annually and post the Form SD on our website.

We encourage our employees, vendors, or other partners to notify us of any issues or concerns regarding our supply chain, including issues and concerns relating to conflict minerals.