



August 1, 2017

Subject: Chain of Custody Statement

To whom it may concern,

Detrex's chain of custody policy is to sell to known and authorized distributors, end use customers and trading partners. Prior to selling to a new account, Detrex makes every reasonable effort to ensure that the distributor, end use customer or trading partner is authorized, prepared and capable of receiving and handling the products we manufacture. Since our hydrochloric acid products are hazardous materials, we adhere to Department of Transportation (DOT) hazardous materials regulations and all other applicable dangerous goods regulations for preparing, packaging, labeling, and documenting our products and their shipment to authorized distributors, end use customer and trading partners. Our products are only consigned for shipment with transportation firms known to Detrex to be authorized to handle and transport hazardous materials / dangerous goods.

Detrex Chemicals adheres DOT and National Fire Protection Association (NFPA) information on the container which further identifies the product. All product labeling conforms to the Global Harmonization System for Labeling of Chemicals (GHS). Detrex can provide transactional information to customers electronically on their request, and Detrex responds to all requests submitted from a distributor, end use customer and trading partner to verify our products. Detrex has a written procedure governing the management of any returned products, including identification, testing, and potential uses if the product is to be resold. It is Detrex policy that any returned drug grade hydrochloric acid can only be resold as an industrial grade of product. Detrex maintains documentation of the disposition of any returned drug grade product.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Vence", is written over a horizontal line.

Jim Vence  
Technical Director  
Detrex Chemicals