



September 9, 2019

Subject: Detrex Chain of Custody Statement

To whom it may concern,

Detrex Chemicals' chain of custody policy is to sell to (trade with) known and authorized trading partners. Prior to trading with a new account Detrex Chemicals makes every reasonable effort to ensure that partner is prepared and capable of receiving and handling the products we manufacture. Since our hydrochloric acid product is a hazardous material 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 customers. Our products are only consigned for shipment with transportation firms known to Detrex Chemicals to be authorized to handle and transport hazardous materials/dangerous goods.

All Detrex Chemicals hydrochloric acid products are labeled with a unique batch and lot number and drug grade Hydrochloric Acid is assigned a 10-digit National Drug Code number. We also apply 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 Chemicals can provide transactional information to customers electronically on their request, and Detrex Chemicals responds to all requests submitted from a trading partner to verify our products. Detrex Chemicals 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 Chemicals' policy that any returned drug grade HCl can only be resold as an industrial grade of product. Detrex Chemicals maintains documentation of the disposition of any returned drug grade product.

Sincerely,

A handwritten signature in black ink that reads "Dave Morgan". The signature is fluid and cursive, with the first name "Dave" and last name "Morgan" clearly distinguishable.

Dave Morgan  
Global Product Manager, Hydrochloric Acid  
Detrex Chemicals