

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM SD

Specialized Disclosure Report
EASTMAN CHEMICAL COMPANY
(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of incorporation or
organization)

1-12626
(Commission File Number)

62-1539359
(I.R.S. Employer Identification No.)

200 South Wilcox Drive
Kingsport, Tennessee 37662
(Address of principal executive offices) (Zip Code)

Kellye L. Walker
Executive Vice President and Chief Legal Officer (423) 229-2000
(Name and telephone number, including area code, of person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

X Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2020.

Section 1. Conflict Minerals Disclosure

Item 1.01. Conflict Minerals Disclosure and Report.

Conflict Minerals Disclosure

Eastman Chemical Company (including its consolidated subsidiaries, the “*Company*”) is filing this Form SD pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 for the reporting period from January 1, 2020 to December 31, 2020 (the “*Reporting Period*”).

Rule 13p-1, through Form SD, requires the disclosure of certain information if a company manufactures or contracts to manufacture products for which certain “conflict minerals” (as defined below) are necessary to the functionality or production of such products. Form SD defines “*conflict minerals*” as: (i)(a) columbite-tantalite (or coltan, the metal ore from which tantalum is extracted), (b) cassiterite (the metal ore from which tin is extracted), (c) gold and (d) wolframite (the metal ore from which tungsten is extracted), or their derivatives, which are currently limited to tantalum, tin and tungsten; or (ii) any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo or an “adjoining country,” as such term is defined in Form SD (collectively, the “*Covered Countries*”).

The Company may at times manufacture, or contract to manufacture, products for which conflict minerals are necessary to the functionality or production of those products (collectively, the “*products*”). As required by Form SD, the Company has conducted a good faith reasonable country of origin inquiry (“*RCOI*”) regarding the conflict minerals included in its products during the Reporting Period, which the Company refers to as the “*Subject Minerals*”, to determine whether any such Subject Minerals originated in the Covered Countries and whether any of the Subject Minerals were from recycled or scrap sources. Where applicable, the Company has conducted additional due diligence regarding the sources of the Subject Minerals. The results of the Company’s RCOI regarding the Subject Minerals, as well as its additional due diligence regarding the sources of such Subject Minerals, are contained in the Company’s Conflict Minerals Report, a copy of which is filed as [Exhibit 1.01](#) to this Form SD, and is publicly available at http://www.eastman.com/Company/investors/Pages/Conflict_Materials_Disclosure.aspx. The content on, or accessible through, any website referred to in this Form SD, including the accompanying exhibit incorporated by reference herein, is not incorporated by reference into this Form SD unless expressly noted.

Item 1.02. Exhibit.

As specified in Section 2 of Form SD, the Company is filing its Conflict Minerals Report as [Exhibit 1.01](#) to this Form SD.

Section 2. Exhibits

Item 2.01. Exhibits.

The following exhibit is filed as part of this Form SD.

Exhibit No.	Description
1.01	Conflict Minerals Report of Eastman Chemical Company

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

EASTMAN CHEMICAL COMPANY

Date: May 26, 2021

By: /s/ Kellye L. Walker
Kellye L. Walker
Executive Vice President and Chief Legal Officer

Eastman Chemical Company
Conflict Minerals Report
For The Year Ended December 31, 2020

This Conflict Minerals Report (this “**Report**”) of Eastman Chemical Company (“**Eastman**” or the “**Company**”) for the year ended December 31, 2020 (the “**Reporting Period**”) is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “**Rule**”). The Rule was adopted by the Securities and Exchange Commission (the “**SEC**”) to implement reporting and disclosure requirements related to Conflict Minerals (as defined below) as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Rule, through Form SD, imposes certain reporting obligations on SEC registrants whose manufactured products contain Conflict Minerals which are necessary to the functionality or production of such products. Form SD defines “**Conflict Minerals**”, also referred to as 3TG, as cassiterite, columbite-tantalite, gold, and wolframite, and their derivatives, which are currently limited to tin, tantalum and tungsten.

Eastman conducted an analysis of the products that it manufactured, or contracted to be manufactured, during the Reporting Period and found that certain Conflict Minerals are necessary to the functionality or production of some of its products. This Report describes the process undertaken by the Company for identifying Conflict Minerals necessary to the functionality or production of these products, as well as management’s country of origin inquiry and additional due diligence measures as to the source and chain of custody of these Conflict Minerals. This Report is available on the Company’s website, http://www.eastman.com/Company/investors/Pages/Conflict_Materials_Disclosure.aspx. The content on, or accessible through, any website referred to in this Report is not incorporated by reference into this Report unless expressly noted.

A number of the statements made in this Report are “forward-looking statements” within the meaning of the Private Securities Litigation Reform Act, Section 27A of the Securities Act of 1933 and Section 21E of the Securities Exchange Act of 1934. Forward-looking statements are all statements, other than statements of historical fact, that may be made by the Company from time to time. In some cases, you can identify forward-looking statements by terminology such as “anticipates,” “believes,” “estimates,” “expects,” “intends,” “may,” “plans,” “projects,” “forecasts,” “will,” “would,” and similar expressions or expressions of the negative of these terms. Forward-looking statements are based upon certain underlying assumptions, including any assumptions mentioned with the specific statements, as of the date such statements were made. Such assumptions are based upon internal estimates and other analyses of current market conditions and trends, management expectations, plans, and strategies, economic conditions and other factors. Forward-looking statements and the assumptions underlying them are necessarily subject to risks and uncertainties inherent in projecting future conditions and results. The Company assumes no obligation to update or provide revisions to any forward-looking statement.

Company Overview.

Eastman is a global specialty materials company that produces a broad range of products found in items people use every day. With a robust portfolio of specialty businesses, Eastman works with customers in attractive end-markets such as transportation, building and construction, and consumables to deliver innovative products and solutions with commitment to safety and sustainability. As a globally inclusive and diverse company, Eastman employs approximately 14,500 people worldwide and serves customers in more than 100 countries. The Company had 2020 revenues of approximately \$8.5 billion and is headquartered in Kingsport, Tennessee, USA.

Eastman uses an innovation-driven growth model which consists of leveraging world class scalable technology platforms, delivering differentiated application development capabilities, and relentlessly engaging the market. The Company’s world class technology platforms form the foundation of sustainable growth by differentiated products through significant scale advantages in research and development and advantaged global market access. Differentiated application development converts market complexity into opportunities for growth and accelerates innovation by enabling a deeper understanding of the value of Eastman’s products and how they perform within customers’ and end-user products. Key areas of application development include molecular recycling technologies, thermoplastic conversion, functional films, coatings formulations, rubber additive formulations, adhesives formulations, nonwovens and textiles, and animal nutrition. The Company engages the market by working directly with customers and downstream users, targeting attractive niche markets, and leveraging disruptive macro trends. Management believes that these elements of the Company’s innovation-driven growth model, combined with disciplined portfolio management and balanced capital deployment, is transforming Eastman to a global materials innovation company that enhances the quality of life in a material way. To facilitate this transformation, the Company is changing its business and operations to improve cost structure, increase investment in growth, and strengthen execution capabilities, including specific initiatives to transform operations, work processes and systems, and business structure alignment, scale, and integration.

Eastman’s use of Conflict Minerals in metallic form includes those in metals sputtered on some of its film products and products that through a wet-laid production process are used in agriculture or mining equipment.

As a global specialty materials company, the Company's products and supply chain are highly complex. While management is aware of the nature of the raw materials and catalysts used in Eastman products, we must nonetheless rely on the Company's direct suppliers to provide information on the origin of Conflict Minerals contained in components and materials supplied to the Company - including sources of Conflict Minerals that are supplied to such direct suppliers from lower tier suppliers. In most instances, Eastman is not in privity of contract with, and is several levels removed from, the entities that mine the Conflict Minerals. For example, Eastman does not purchase raw ore or unrefined Conflict Minerals. The Company therefore does not typically have a direct relationship with Conflict Minerals smelters and refiners and does not perform or direct, or have the ability to perform or direct, audits of these entities within the Company's supply chain.

Reasonable Country of Origin Inquiry.

As required by Form SD, Eastman has conducted a good faith reasonable country of origin inquiry ("**RCOI**") regarding the Conflict Minerals included in its products during the Reporting Period to determine whether any of such Conflict Minerals originated in the Democratic Republic of the Congo or an "adjoining country" (as defined in Form SD) (collectively, the "**Covered Countries**") and whether any of such Conflict Minerals may be from recycled or scrap sources. Prior to and during the Reporting Period, the Company's Conflict Minerals Team ("**Team**") identified Eastman products in which a Conflict Mineral was known to be used, as well as the suppliers of such products, which we refer to in this Report as "**known Conflict Minerals suppliers**".

We participate in an industry initiative that audits smelters' and refiners' due diligence activities. That industry initiative is the Responsible Minerals Initiative ("**RMI**") (previously known as the Conflict Free Sourcing Initiative). As a member of RMI, the Team used the RMI Conflict Minerals Reporting Template ("**Template**") and associated due diligence information developed by the RMI to query all of our known Conflict Minerals suppliers as to their use of Conflict Minerals. The Template includes a number of questions and requires each supplier, as applicable, to identify all of the smelters used to supply any Conflict Minerals contained in materials or products supplied by such supplier, whether those smelters are in one of the Covered Countries, and the source country of Conflict Minerals used by each of the smelters. The Team reviewed completed Templates to determine whether (i) the information appeared to be correct, complete, and internally consistent, (ii) the identified smelters are on one of the RMI Program Compliant Lists (described below) or whether the suppliers have advised that they intend to participate in the Program (described below), and (iii) any of the identified smelters source from a Covered Country.

RCOI Responses and Follow-up.

The Company received completed Templates from all of our known Conflict Minerals suppliers; however, one known Conflict Minerals supplier did not satisfactorily complete the Template. The Company has requested that this Conflict Minerals supplier provide additional information in a follow-up request, the responses to which have not yet resolved all of the Company's questions.

We note that our raw materials suppliers, like Eastman, are reliant upon information provided by their suppliers. In some cases, raw materials suppliers or their suppliers may still be unfamiliar with the Rule, especially if they are not subject to the Rule themselves. As noted, the Team reviewed the completed Templates against criteria developed to determine which required further engagement. These criteria included untimely or incomplete responses as well as inconsistencies within the data reported in the Template. The Team worked directly with a known Conflict Minerals supplier to obtain more complete responses.

Conflict Minerals Due Diligence Process.

The Company's Conflict Minerals due diligence measures described herein, which have been designed to conform, in all material respects, with the framework in The Organisation for Economic Co-operation and Development ("*OECD*") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("*OECD Guidance*") and the related Supplements for gold and for tin, tantalum and tungsten, are summarized below.

(a) *Establish Strong Company Management Systems.*

We have adopted the following Statement on Responsible Minerals:

Eastman is committed to conducting our business activities in accordance with the highest legal and ethical standards. This commitment is reflected in our Code of Business Conduct. We are also committed to sourcing materials from suppliers that share our values, and we expect our suppliers to comply with our Third Party Code of Conduct - Doing Business with Eastman. Eastman is committed to responsible mineral sourcing, which means that sourcing will be ethical, sustainable, and protective of the human rights of everyone in our supply chain.

Eastman complies with section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd Frank") dealing with tin, tungsten, tantalum, and gold ("3TG") sourced from the Democratic Republic of Congo or adjoining countries. Eastman has a Responsible Minerals Sourcing Program whose purpose is to prevent the use of 3TG in the manufacture of its products that directly or indirectly fund violence or human rights abuses in the Democratic Republic of the Congo or adjoining countries.

To address growing concerns about child labor and other human rights violations beyond the scope of Dodd Frank, Eastman has expanded our responsible minerals program and due diligence practices, which align with the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas of the Organization for Economic Cooperation and Development ("*OECD*").

Eastman is a member of the Responsible Minerals Initiative ("RMI"). We conduct due diligence on source and chain of custody using RMI's Responsible Minerals Assurance Process ("RMAP") and we encourage our suppliers to adopt responsible sourcing practices. We also publicly report results of our due diligence annually in compliance with the requirements of Dodd Frank.

Eastman's Expectations for Suppliers

- Participate in RMAP. Develop supply chain due diligence and provide responses to Eastman. Respond to Eastman's due diligence requests in a timely manner providing current and accurate information, updating as needed to ensure continuing accuracy.
- Supply raw materials that do not contribute to human rights abuses.
- Adopt responsible minerals practices consistent with Eastman's statement.

Concerns regarding this statement or any potential violations of this statement may be reported through Eastman's Business Conduct Helpline: 1-800-455-5622.

Internal Team.

As discussed above, Eastman has established a management system for sourcing of Conflict Minerals (sometimes referred to as a "Responsible Minerals" program). The Company's management system includes a Responsible Minerals Team co-sponsored by the Vice President, Global Supply Chain and the Vice President, Legal and Corporate Secretary. The Team is comprised of subject matter experts from relevant functions such as procurement, product data management, the legal department, and product stewardship. The team of subject matter experts is responsible for implementing management's Conflict Minerals and Responsible Minerals compliance and due diligence program and practices. Senior management is briefed on results of the due diligence efforts on a regular basis.

Control Systems.

Since the Company does not have direct relationships with Conflict Minerals smelters and refiners, management has used its membership in RMI and the Template and associated due diligence information developed by the RMI to work with RMI and our suppliers to identify upstream participants in the supply chain and conduct due diligence investigation of them.

Internal controls include, but are not limited to, Eastman's Code of Business Conduct which outlines expected behaviors for all Eastman employees, the Third-Party Code of Conduct - Doing Business with Eastman, and supplier Responsible Minerals contract provisions.

Supplier Engagement.

With respect to the OECD requirement to strengthen engagement with suppliers, management continues to engage the Company's raw materials suppliers, asking that they complete a RMI Template and provide additional information as necessary. Follow-up on this engagement, as further described herein, depends upon the nature and extent of the information received from these suppliers, and further information available from RMI. Feedback from this engagement has allowed management to better understand the supply chains of Eastman suppliers and the level of knowledge these suppliers have of their own supply chains. Management believes this engagement has helped to improve the quality of the responses received and will improve the quality of future responses.

Contracts with the Company's raw materials suppliers are typically of durations of at least two to five years, and Eastman does not unilaterally impose new contract terms and flow-down requirements. As Eastman enters into new contracts, or existing contracts are renewed, the Company typically adds a provision to relevant contracts to require suppliers to provide information about the source of Conflict Minerals and smelters. The Company believes it will be several years before all of the Company's relevant supplier contracts contain flow-down clauses. Management continues to work with suppliers to ensure they provide Conflict Minerals sourcing information until all relevant supply contracts have been amended or replaced.

Grievance Mechanism.

Concerns regarding the Company's Conflict Minerals process and Responsible Minerals Statement or any potential violations may be reported through Eastman's Business Conduct Helpline. The RMI also maintains a separate Minerals Grievance Platform where concerns can be reported, for both members and non-members in the supply chain.

Records Maintenance.

The Company policy is to retain relevant documentation in a secure location for a period of seven years.

(b) Identify and Assess Risk in the Supply Chain.

As discussed in "(a) Supplier Engagement" above, the Company is continuing to assess its supply chain to reduce the likelihood that the Conflict Minerals used in the Company's products could benefit armed groups in the Covered Countries and works with its suppliers to develop greater supply chain transparency.

(c) Design and Implement a Strategy to Respond to Identified Risks.

In situations where a supplier has disclosed the existence or potential existence of Conflict Minerals that were sourced from the Covered Countries in one or more components or parts that they sell to the Company for incorporation into Eastman products, the Company, directly and through its membership in RMI, has employed a practice of further engagement with such supplier in an effort to better understand its procurement practices and how it intends to reduce the likelihood that such Conflict Minerals could benefit armed groups in the Covered Countries. With this information, Eastman believes it will be better positioned to evaluate the circumstances affecting such supplier and formulate the Company's action plan with respect to continued sourcing from such supplier.

In addition, RMI also has developed its Responsible Minerals Assurance assessment protocols (“**RMAP**”) that includes a list of smelters and refiners that are RMAP conformant (the “**RMAP Conformant List**”). The conformant lists represent the smelters and refiners that have successfully completed an assessment against the applicable RMAP standard or an equivalent cross-recognized assessment. RMAP assessments are backward-looking. The assessment evaluates the auditee’s due diligence systems and processes to conform with the RMAP standards. It is not a material validation assessment. The active lists represent smelters and refiners that have committed to undergo an RMAP assessment, completed the relevant documents, and scheduled the on-site assessment. These may be in the pre-assessment, assessment, or corrective-action phases of the assessment. The operational impacts of the COVID-19 pandemic has caused postponements of some RMAP assessments. RMI is remaining in regular communication with participating companies and actively working with all facilities to accommodate requests for rescheduling. Ideally, all of the smelters and refiners of a Conflict Mineral that Eastman uses will be on one of the Program Compliant or Active Lists. As part of Eastman’s due diligence investigation, Eastman requests that relevant smelters used by its suppliers complete the Program, and insists they do so if they are located in, or source in, a Covered Country. Further, Eastman provides smelter information received from its suppliers to RMI so that RMI can work directly with the smelter to conduct the necessary due diligence. RMI, in turn, reports information on smelter sourcing to its members, information that may be useful in confirming that the information we receive from our suppliers is correct and complete.

(d) Carry Out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain.

Due to the Company’s downstream position in the supply chain, it does not have a direct relationship with smelters and refiners, nor does it perform direct audits of the smelters and refiners that provide our suppliers with the Conflict Minerals contained in the Company’s products. Where possible, the Company has relied on third-party assurances and certifications, especially through its membership in RMI. For example, the Company accepts as reliable information provided by any smelter that is a member of the RMI Program. To the extent that other audited supplier certifications are provided to the Company, Eastman considers reliance on a case-by-case basis. As a member of RMI, Eastman also has access to additional information from RMI for smelting and refining facilities that are validated through the Program, including smelter location, country of origin information, most recent audit date, mineral sourcing country information, and access to the smelters’ Conflict Minerals policy.

(e) Report on Supply Chain Due Diligence.

This Report is publicly available at http://www.eastman.com/Company/investors/Pages/Conflict_Materials_Disclosure.aspx, in accordance with the OECD recommendation to report annually on supply chain due diligence.

Conflict Minerals Diligence Results.

The Company relies on its direct suppliers to provide information on the origin of the Conflict Minerals contained in components and materials supplied to Eastman - including sources of Conflict Minerals that are supplied to them from lower tier suppliers. As noted, the Company uses the RMI materials in its OECD-compliant program, which includes requesting suppliers to complete the Template. Management believes that this method of obtaining information about Conflict Minerals smelters and refiners in the Company’s supply chain from direct suppliers represents a reasonable effort to determine the mines or locations of origin of the Conflict Minerals in Eastman’s supply chain, is reasonably designed to determine the Company’s use of Conflict Minerals, is being carried out in good faith for the purpose of complying with its regulatory obligations, and satisfies the Company’s obligation to conduct a reasonable country of origin inquiry. In determining whether further due diligence investigation is required in a given instance, the Company has in certain instances also relied upon additional supplier certification or participation in the RMI Program in determining the source of Conflict Minerals in its products.

As described in the Company’s Statement on Responsible Minerals (described above), management intends to continue to engage any suppliers that management believes may be supplying the Company with Conflict Minerals from sources that may support conflict in a Covered Country to establish an alternative source of Conflict Minerals that does not support such conflict, as provided in the OECD Guidance.

Based on the RCOI and due diligence measures described above, however, the quality of the responses received from Conflicts Minerals suppliers remains variable, making management hesitant to rely fully on all of these responses. Quality improved in 2020 over 2019, and management expects the quality of this information to continue to improve over time as the Company’s suppliers become more familiar with the information necessary to properly make this determination.

Based on the information obtained in the RCOI and due diligence process described above, to the extent that suppliers were responsive, the Company believes that the facilities listed below may have been used to process the 3TGs contained in the Company's products during the Reporting Period:

With regard to the Company's gold suppliers:

	Smelter Name	Smelter Country
1.	Metalor USA Refining	United States
2.	Saxonia Edelmetalle GmbH	Germany
3.	Wieland Edelmetalle GmbH	Germany

Based upon the information currently available to the Company, the Covered Countries from which some of the above-listed smelters purchased gold in 2020 are the Democratic Republic of Congo, Tanzania, and Zambia (aggregated data from London Bullion Market Association (LBMA) and the Responsible Jewellery Council (RJC)).

With regard to the Company's tin suppliers:

	Smelter Name	Smelter Country
1.	Chifeng Dajingzi Tin Industry Co., Ltd.	China
2.	China Tin Group Co., Ltd.	China
3.	EM Vinto	Bolivia
4.	Fenix Metals	Poland
5.	Gejiu Non-Ferrous Metal Processing Co., Ltd.	Indonesia
6.	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	China
7.	Malaysia Smelting Corporations (MSC)	Malaysia
8.	Metallic Resources	United States
9.	Metallo Belgium N.V.	Belgium
10.	Mineracao Taboca	Brazil
11.	Minsur	Peru
12.	Mitsubishi Materials Corporation	Japan
13.	Operaciones Metalurgical	Bolivia
14.	PT Artha Cipta Langgeng	Indonesia
15.	PT Bukit Timah	Indonesia*
16.	PT Menara Cipta Mulia	Indonesia
17.	PT Mitra Stania Prima	Indonesia
18.	PT Refined Bangka Tin	Indonesia
19.	PT PT Timah Tbk Kundur	Indonesia
20.	PT Timah Tbk Mentok	Indonesia
21.	Thaisarco	Thailand
22.	Tin Technology & Refining	United States
23.	White Solder Metalurgia	Brazil
24.	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China
25.	Yunnan Tin Company Limited	China

*This company is an eligible smelter and is engaged in the RMAP but not yet conformant.

Based upon the information currently available to the Company, the Covered Countries from which some of the above-listed smelters purchased tin in 2020 are the Democratic Republic of Congo, Burundi, Rwanda, and Uganda. OECD-identified High Risk Areas where tin was purchased in 2020 included Brazil, Burundi, China, Democratic Republic of Congo, Indonesia, Myanmar, Nigeria, Russia, Rwanda, Thailand and Uganda.

With regard to the Company's tungsten suppliers:

	Smelter Name	Smelter Country
1.	Chenzhou Diamond Tungsten Products Co., Ltd.	China
2.	China Molybdenum	China
3.	Chongyi Zhangyuan Tungsten Co., Ltd.	China
4.	Ganzhou Huaxing Tungsten Products Co., Ltd.	China
5.	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China
6.	Ganzhou Seadragon W & Mo Co., Ltd.	China
7.	Global Tungsten & Powders Corp.	United States
8.	HC Starck Tungsten GmbH	Germany
9.	Hunan Changda Vanadium Tungsten Co., Ltd. Wuji	China
10.	Jiangwu HC Starck Tungsten Products Co., Ltd.	China
11.	Kennametal Huntsville	United States
12.	Moliren Ltd.	Russia
13.	Niagara Refining LLC	United States
14.	Tejing (Vietnam) Tungsten Co., Ltd.	Vietnam
15.	Xiamen Tungsten (HC) Co., Ltd.	China
16.	Xiamen Tungsten Co., Ltd.	China

Based upon the information currently available to the Company, the Covered Countries from which some of the above-listed smelters purchased tungsten in 2020 are the Democratic Republic of Congo, Burundi, Rwanda, and Uganda (aggregated data from the Tungsten Industry-Conflict Minerals Council).

Additional Steps to be Taken.

In addition to the steps already taken, as set out above, Eastman intends to continue the following, or other appropriate, steps to continue to improve the due diligence conducted in an effort to further mitigate the likelihood that the Conflict Minerals used in the Company's products could benefit armed groups in the Covered Countries:

- a. Include a Responsible Minerals clause with Conflict Minerals provisions in relevant new or renewed supplier contracts.
- b. Further engage with suppliers, directly and through its membership in RMI, and direct them to training resources to attempt to increase the response rate and improve the content of the supplier survey responses.
- c. Require that any of the Company's suppliers found to be supplying Eastman with Conflict Minerals from sources that support conflict in a Covered Country work to establish alternative sources of Conflict Minerals that do not support such conflict.
- d. Continue to work with the OECD, RMI, and other relevant trade associations to define and improve best practices and build leverage over the supply chain in accordance with the OECD Guidance.
- e. Evaluate potential tools to develop more efficient internal processes for tracking and analyzing suppliers and sources.