

"Kloeckner Metals Corporation (KMC) will purchase product only from vendors who have confirmed that based upon a "reasonable country of origin inquiry" (RCOI) the materials they have supplied since January 31st, 2013 and the material they continue to supply KMC do not contain any of the "conflict minerals" originating from the Democratic Republic of Congo (DRC) or adjoining countries, as per the Dodd-Frank Wall Street Reform and Consumer Protection Act, P.L. 111-203."

With the enactment of the Dodd Frank Wall Street Reform and Consumer Protection Act and specifically, the Conflict Minerals Rules, a vast majority of our customers are now required to exercise due diligence on their supply chain custody and disclose whether any "Conflict Minerals" used to manufacture their products originated in the Democratic Republic of Congo ("DRC") or its adjoining countries (together with the DRC, the "Covered Countries"). Presently, these adjoining countries include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

These "Conflict Minerals" consist of columbite-tantalite, cassiterite, **gold**, wolframite, or their derivatives, which are initially limited to **tantalum**, **tin**, and **tungsten**. The majority of the products we sell do not require these minerals. Kloeckner Metals Corporation and its subsidiaries ("Kloeckner Metals") firmly believe that an industry-wide approach is required to address this industry-wide issue.

To that end, for those products requiring the above minerals, we are committed to only purchase such material from suppliers in which none of the Conflict Minerals were sourced from a Covered Country ("DRC Conflict Free").

