



ELGILOY SPECIALTY METALS

DIVISION OF COMBINED METALS OF CHICAGO LLC

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Conflict Minerals Policy

Elgiloy Specialty Metals is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Elgiloy seeks to source products, components and materials from companies that share our values around human rights, ethics, and environmental responsibility.

In August 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain “conflict minerals” originating from the Democratic Republic of the Congo (the “DRC”) or adjoining countries. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations. The four most commonly mined **conflict minerals** (known as 3TGs, from their initials) refers to the metals of tantalum, tin, tungsten and gold, which are the derivatives of the minerals cassiterite, columbite-tantalite and wolframite, respectively.

Elgiloy supports industry-wide efforts to identify, reduce and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations. Elgiloy is committed to complying with any applicable requirements under the Conflict Minerals Rule and has implemented a due-diligence process to meet its obligations under the legislation.

Suppliers to Elgiloy are expected to establish their own conflict minerals policies, due diligence frameworks and management systems that are designed to prevent conflict minerals originating from the DRC or an adjoining country, to the extent that they benefit groups committing human rights violations, from being included in the products sold to Elgiloy. In the event Elgiloy determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, Elgiloy reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.