

Statement of Compliance Under Dodd Frank Act Directive: Disclosure of Conflict Minerals and Materials

On 21 July 2010, in response to concerns involving human rights violations in the mining of specific minerals, the United States Congress enacted legislation that requires public companies to provide disclosures about the use of specified conflict minerals emanating from the Democratic Republic of the Congo (DRC) and nine adjoining countries (Covered Countries).

Climax Metal Products Company is committed to acting in a responsible manner by complying with the U.S. Securities and Exchange Commission's adopted final rule to implement reporting and disclosure requirements related to "conflict minerals," as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

The products produced by Climax Metal Products Company are DRC Conflict Free and comply with Section 1502 of Dodd Frank, Conflict Minerals, Final Rule, August 22, 2012, II. A.3. (pp.39-40); II. B.4.c.i.-v (pp.82-94.) Our products do not contain Tantalum, Tin, Tungsten, or Gold that have been intentionally added to the product. Additionally, Climax Metal Products has verified that any key suppliers that utilize Tantalum, Tin, Tungsten or Gold in the materials or components they provide have been sourced from compliant smelters.

Additionally, we will refrain from intentionally purchasing products that contain Conflict Minerals from the DRC and Covered Countries, and expect our suppliers to be held accountable for providing documentation confirming their compliance with the Dodd-Frank Act. In order to maintain compliance, Climax Metal Products Company has surveyed key suppliers to ascertain their use of any Conflict Minerals they supply to us. We will continue to work with our key suppliers to ensure that we are able to identify the use of Conflict Minerals in our supply chain, and the representations made in this compliance statement remain accurate.

Climax Metal Products Company will continue to review its regulatory compliances and update appropriate documentation as necessary.

Feel free to contact us if you have any further questions.

Mark Rigsby
Director of Operations