

Unisteel Conflict Mineral Policy – Updated July 2017

There has been an increased awareness of violence and human rights violations in the mining of certain minerals from the eastern regions of the Democratic Republic of the Congo (DRC) and its surrounding countries known as the “Conflict Region”. In compliance with the Dodd-Frank Financial Reform Bill and the Consumer Protection Act of 2010, the U.S. Securities and Exchange Commission (“SEC”) adopted rules and requirements for U.S. companies to report and disclose any activities related to “Conflict Mineral”. Companies worldwide are requested to exercise reasonable due diligence in their supply chain to ensure that certain metals are not sourced from mines within the Conflict Region that is controlled by non-government military groups or unlawful military factions.

“Conflict mineral” refers to gold, tin, tantalum, tungsten and its derivatives, including cassiterite, columbite-tantalite, and wolframite. This list may further designate other minerals in future. Unisteel supports these requirements to promote the humanitarian goal of ending violent conflicts in the Democratic Republic of the Congo (DRC) and the surrounding countries that are partially financed by the exploitation and trade of “Conflict Minerals”.

OUR COMMITMENT

1. Support the aims and objectives of the U.S. legislation on the supply of “Conflict Minerals”.
2. Do not knowingly procure specified metals that originated from facilities within the “Conflict Region” and are not certified “Conflict Free”.
3. Ensure compliance with these requirements and requests our suppliers to undertake reasonable due diligence with their supply chains to ensure that specified metal are being sourced only from:
 - Mines and smelters outside the “Conflict Region” or
 - Mines and smelters that have been certified by an independent third party as “Conflict Free” if sourced within the “Conflict Region”.

This due diligence includes having our suppliers provide written documentations that the raw materials used to produce gold, tin, tantalum, and tungsten used in the materials to manufacture components and products supplied to Unisteel originated from outside the “Conflict Region”; or, if they originated from within the “Conflict Region”, the mines or smelters must be certified “Conflict Free” by an independent third party. The aim is to ensure that only “Conflict Free” materials and components are used in the products that we procure.

Should we discover the use of such minerals produced in facilities that are considered to be “Non-conflict Free”, in any of the material, parts or components we procure, we will take appropriate actions to ensure our product is “Conflict Free”.

As a leading global company in the development and delivery of fastening, machining, stamping and plastic molding solutions, Unisteel is committed to ensure the safety, health and protection of the people and environment worldwide. We promote these principles in our global business practices and our code of conduct.

Chief Operating Officer



Chief Executive Officer

