

CONFLICT MINERALS POLICY

The policy of Amalgamated Metal Corporation (AMC) is to completely exclude all Conflict Minerals and Metals from all of its supply chain.

Conflict Minerals and Metals are materials, which through their mining, production or supply have either knowingly or inadvertently been of benefit to illegal armed groups. All such materials are excluded from the AMC Groups' supply chain through the application of due diligence and traceability systems. Consequently, all AMC's products can be categorised as being conflict free.

In accordance with the OECD Due Diligence Guidelines for Responsible Supply Chains, the policy is to undertake a risk assessment on the metals and minerals the Group purchases. Where there is risk of such metals and minerals arising from conflict areas the following policies will be adopted:

- The policy is to purchase materials only from reputable suppliers with whom long term relationships have been established or on whom adequate due diligence in terms of know your supplier protocols can be carried out.
- In all cases due diligence will be conducted on the supplier and supply chain to ensure that the supply is genuine, legitimate and does not in any way contribute to conflict or human rights abuses.
- Due diligence will include written documentary evidence of origin including certification and assurance from each supplier confirming that there are no Conflict Metals and Minerals in their own supply chain.
- Information available in the public domain, including micro-economic data and in particular detailed trade statistics, will be monitored as part of the whole due diligence process.
- The due diligence will be on-going and the origin of the materials will continue to be checked for each shipment.
- The AMC Group will at all times comply with both national and international law relating to Conflict Minerals, including UN Security Council Resolutions and the US Dodd Frank Act.

The AMC Group has adopted the OECD Due Diligence Guidelines for Responsible Supply Chains and will continue to work with the Electronic Industry Citizenship Coalition (EICC) to ensure Conflict Free Smelter status for its relevant operations.

The AMC Group policy is to differentiate itself by offering its customers and trading partners assured conflict free metals and products, so that the final customer in the supply chain can be confident its products are produced from metals which are conflict free.