



October 11, 2019

**Subject: Supplier Confirmation and Declaration of Compliance with the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act H.R. 4173 Section 1502.**

Dear Valued Customer,

In July 2010, President Barack Obama signed Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act into law. This was done in an attempt to prevent militant groups operating in the Democratic Republic of Congo (DRC), or one of the nine African nations that share a border with DRC, from illegally using the profits from the minerals trade to fund their activities. In August 2012, the United States Securities and Exchange Commission (SEC) published its final rules implementing the provisions of the Dodd-Frank Act. These rules define new reporting requirements for companies who manufacture, or contract to manufacture, products that use specific ores and their derivatives (namely tin, tantalum, gold, and tungsten), collectively defined as "Conflict Minerals".

Associated Tube Group is committed to meeting the requirements of the SEC's Conflict Minerals rule. Since Associated Tube Group is a processor and not a producer of metal, we have reviewed the Conflict Minerals requirements with our raw material suppliers to ensure compliance. Declarations were submitted to Associated Tube Group by their suppliers confirming that no Conflict Minerals originating from DRC or its neighbouring countries are utilized in the manufacture of materials they supply to us.

Associated Tube Group asserts that, based on the information provided to us, our products do not contain Conflict Minerals and are in compliance with Section 1502 of the Dodd-Frank Act.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Williams", with a large, stylized initial "P" and a long, sweeping underline.

Philip Williams  
Director, Technical Development

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