



**HEADQUARTERS**

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**Tempel Steel Company  
Conflict Minerals Policy**

**April 10, 2015**

Consistent with its General Business Ethics Policy, Tempel Steel Company, (“Tempel”) recognizes and supports Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. As a privately held company, Tempel is not required to report to the Security and Exchange Commission. However, Tempel is committed to assisting our customers in complying with their reporting obligations.

Tempel fully supports the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (“DRC”) and surrounding countries (the “Conflict Region”).<sup>1</sup> Accordingly, Tempel will not purchase or participate in the use of “Conflict Minerals,” meaning tin (cassiterite), tantalum (columbite-tantalite), tungsten (wolframite), or gold, sourced from the Conflict Region, either directly or indirectly.

Tempel commits to practicing reasonable due diligence by partnering with suppliers that share its goal of eliminating the use of Conflict Minerals derived from the Conflict Region. To ensure that all products purchased and produced by Tempel are “DRC Conflict Free,” Tempel commits to taking the following steps:

- On a yearly basis, Tempel will require each supplier from which Tempel purchases steels and other materials that may contain Conflict Minerals to certify the following in writing:
  - Whether any of the material supplied or sold to Tempel contains Conflict Minerals from the Conflict Region;
  - The country of origin for any Conflict Minerals contained in the material supplied or sold to Tempel;
  - Whether the material supplied or sold to Tempel contains recycled or scrap sources; and
  - If any of the material supplied or sold to Tempel does contain Conflict Minerals from the Conflict Region, whether the material is DRC Conflict Free.
- Tempel will maintain the supplier certifications and request updated certifications from its suppliers of products containing Conflict Minerals on a yearly basis.

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<sup>1</sup> In addition to the DRC, the other countries included in the Conflict Region are Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.



- Tempel will conduct further investigation as warranted by facts brought to the attention of the General Counsel. The General Counsel is authorized to use whatever outside resources, measures, and/or counsel that the General Counsel deems necessary.