



NORTH METAL & CHEMICAL CO.

Manufacturer of

Molybdenum & Tungsten Compounds

Since 1921

CONFLICT MINERALS STATEMENT: SODIUM TUNGSTATE

February 28, 2018

North Metal and Chemical Company acknowledges the United Nations' Security Document (S/2001/357): "Final Report of the Panel of Experts on the illegal Exploitation of Natural Resources and Other Forms of Wealth of the Democratic Republic of the Congo". This report outlines the enterprises surrounding the illegal exploitation of tantalum and tungsten containing minerals from the DRC and adjoining areas (Sudan, Uganda, Rwanda, Burundi, United Republic of Tanzania, Zambia, Angola, Congo, and the Central African Republic) that finance illegally armed groups and perpetuate human rights violations. In response to this report and pressure from non-profit organizations, the US Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (July 21, 2010). Specifically, the legislation contains an SEC ruling designed to eradicate Conflict Minerals from the global supply chain.

Pursuant to these events, North Metal and Chemical Company does not purchase or supply tungsten materials whose origin can be traced back to the DRC or surrounding countries. North Metal and Chemical Company requires the necessary documentation from all of our raw material suppliers in accordance with the Conflict-Free Smelter Program (CFSP) to guarantee that only conflict-free materials enter our facility. Specific to Tungsten, North Metal and Chemical Company only purchases secondary or scrap/recycled materials as defined by the Conflict-Free Sourcing Initiative (CFSI). Specifically, our production facilities "follow the Dodd-Frank Wall Street Reform and Consumer Protection Act" by contracting scrap material from the Industrial and Military manufacturing sector in India.

These materials have been designated as exempt by US legislation and the Electronic Industry Citizenship Coalition (EICC). Our Conflict-Free Minerals policy is elemental to North Metal and Chemical Company's Standard Operating Procedure for purchasing, processing, and supplying tungsten materials.

Since the source Tungsten is made from scrap or recycled materials, the SEC ruling requires you to file a Form SD that discloses this "scrap" determination and briefly describe the RCOI and the (Indian) results of the inquiry. However, you are not required to file the Form SD if your company does not have to file forms 10K, 10Q, or 8K with the SEC.

Please contact me at DFitzgerald@nmc-nic.com if you have any further questions. The detailed SEC ruling can be found at <http://www.sec.gov/rules/final/2012/34-67716.pdf>.

Regards,

David R. Fitzgerald
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North Metal and Chemical Company

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