

10/1/2019

Dear Customer:

Thank you for your letter regarding the “Conflict Minerals” rule finalized on August 22, 2012, by the Securities and Exchange Commission (“SEC”) as directed by Section 1502 of the Dodd-Frank Act of 2010 (“the Conflict Minerals Rule”).

The Conflict Minerals Rule applies to manufacturers of products containing any of the four conflict minerals (tin, tantalum, tungsten and gold) if the conflict minerals are “necessary to the functionality or production” of the product. The SEC has provided guidance that “intentionally adding” a conflict mineral to the product is a measure of whether the mineral was necessary to the functionality or production of the product. We take this to mean that alloys containing trace elements of a conflict mineral as contaminants and impurities do not cause that product to fall under the requirements of the rule.

Of the four conflict minerals subject to the Conflict Minerals Rule, only tin and gold are necessary to the functionality of some of our products as an alloying element or as a coating. For those products that include tin as an alloying element, tin is added to the alloys by our alloy suppliers. For those products where tin is added as a coating, we either conduct that tin-plating process ourselves with virgin and/or Grade A tin ingots we purchase or have third-party subcontractors perform the tin-plating operation. For some of our products, gold is added as a coating by third-party contractors who perform gold-plating operations.

As required by the Conflicts Minerals Rule, we have established a reasonable country of inquiry procedure to determine whether the source of the tin we purchase, and the sources of the tin and gold used by our subcontractors and suppliers, originated in the Democratic Republic of the Congo or any of its adjacent countries (collectively the “DRC”).<sup>1</sup> So long as the tin and gold in our products is not sourced from the DRC or comes from scrap or recycled materials, it is considered DRC conflict-free. At this time we are not aware of the inclusion of any tin or gold in our products sourced from the DRC or which did not come from scrap or recycled materials. We will continue working with our suppliers to ensure that our products remain DRC conflict-free.

Thank you for the opportunity to address your concerns regarding the SEC’s Conflict Minerals Rule, and most importantly, for the opportunity to be your supplier. We appreciate your business.

Sincerely,



Scott Faniola  
Director Supply Chain  
*Wieland Metal Services*

\*The adjacent countries are the Congo, Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, or Angola.