

Introduction

The Dodd-Frank Act created a new expectation for product manufacturers, which may be far removed from the source of the raw minerals in their products.

Robinson Metal, Inc. manufactures custom products that require materials manufactured by thousands of other companies located around the world. We are committed to acting in a socially and environmentally responsible manner, to complying with the law, to meeting our customer commitments and supporting our customers' businesses.

Because of the complexity of many supply chains and the lack of an established system for product manufacturers to track Conflict Minerals back to their source, the joint efforts over an extended period by many governments, industry groups and companies will be required to make it possible to effectively trace Conflict Minerals back to their source.

This document sets forth the policy of Robinson Metal, Inc. regarding Conflict Minerals.

Overview

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law. The Dodd-Frank Act and related 2012 US Securities and Exchange Commission rules require certain companies to disclose whether the product they manufacture or contract to manufacture contain Conflict Minerals necessary for the production or the functionality of the products that are sourced from mines in the Democratic Republic of the Congo or adjoining countries.

Conflict Minerals are:

- Cassiterite – Ore from which **tin** is extracted. Major uses are plating and solders for joining pipes and electronic circuits.
- Columbite-tantalite – Ore from which **tantalum** is extracted. Major uses are electrical components (including those used in mobile phones, computers, videogame consoles), aircraft and surgical components.
- **Gold** – Rare metal found in a native (pure) form and obtained as a by-product of other mining operations. Major uses are jewelry, electronic, communications and aerospace equipment.
- Wolframite – Ore from which **tungsten** is extracted. Major uses are metal wires, electrodes and contacts in lighting, electronic, electrical, heating and welding applications.

Dodd-Frank Section 1502 defines the affected countries or “Covered Countries” as follows:

Democratic Republic of the Congo (DRC) – The Republic of the Congo – Central Africa Republic
South Sudan – Zambia – Angola – Tanzania – Burundi – Rwanda – Uganda

Products are “DRC Conflict Free” if they contain only Conflict Minerals that did not originate in the DRC or an adjoining country, are from recycled or scrap sources, or have not benefitted the armed groups identified as perpetrators for the abuses that are the subject of the Dodd-Frank Act.

Commitment

We are committed to supporting the aims and objectives of the Dodd-Frank Act concerning Conflict Minerals. We will not continue to source from a supplier any product that contains Conflict Minerals if Robinson Metal Inc. determines the product is not DRC Conflict Free and the supplier fails to implement reasonable steps to transition to DRC Conflict Free sources.

We support the humanitarian goals of the Dodd-Frank Act and encourage our suppliers to adopt that same policy for their businesses. Robinson Metal Inc. does not directly purchase any raw Conflict Minerals for mines, smelters and refiners that produce the metals used in the raw materials manufactured by our suppliers.

Expectation

Robinson Metal Inc. has the following expectations of our suppliers:

- Suppliers should not include in any products sold to Robinson Metal Inc. any Conflict Minerals that are not DRC Conflict Free.
- Suppliers should develop Conflict Minerals policies, due diligence frameworks and management systems that are designed to prevent Conflict Minerals that are not DRC Conflict Free from being included in the products sold to Robinson Metal Inc.

Suppliers are expected to:

- Source Conflict Minerals only from sources that are DRC Conflict Free.
- Implement and communicate to their personnel and suppliers policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same.
- Use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free, and require their direct and indirect suppliers to do the same.
- Advise Robinson Metal Inc. of any determination that the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to us is not DRC Conflict Free.
- Maintain reviewable business records supporting the source of Conflict Minerals.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in Conflict Minerals supply chains.

Non-Compliance

Suppliers who do not reasonably comply with this Policy shall be reviewed by Robinson Metal Inc.'s supply chain organization for future business. In the event Robinson Metal Inc. determines that a supplier's efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, we reserve the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Reporting

Our employees, suppliers and other parties can report concerns and alleged violations of this Policy as follows:

- **E-mail Us at:** mail@robinsonmetal.com
- **Contact your Buyer at:** 920-494-7411

Reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law. We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith. Our suppliers are encouraged to contact Quality Assurance at mail@robinsonmetal.com if they wish to seek guidance on the application of this Policy.

Conclusion

Robinson Metal Inc. fully understands the importance of this issue to our customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a DRC Conflict Free supply chain. We encourage all of our suppliers to likewise support these efforts.