



# Conflict Minerals Policy Statement

**Universal Metal Products, Inc.**  
29980 Lakeland Blvd.  
Wickliffe, Ohio 44092  
(440) 943-3040  
Solutions@ump-inc.com

Policy #120104 Rev. 12/21/2015

## Overview

Universal Metal Products, Inc. ("UMP") is committed to conducting its business worldwide with respect for human rights and in compliance with applicable laws.

Profits from the mining of 3TG minerals <sup>(1)</sup> found in the Democratic Republic of Congo and adjoining countries (the "DRF Region") <sup>(2)</sup> have provided financial support to armed groups that commit violence and human rights violations in the region. Consistent with our values, we do not want to contribute to conflict in the DRF Region through our procurement practices, and are therefore working to better understand the origin of any 3TG minerals found in our products.

In 2012, the Securities and Exchange Commission adopted rules implementing the provisions of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") relating to the use of 3TG minerals in manufactured products. These rules require public companies to annually disclose information about whether any products they manufacture or contract to manufacture contain 3TG minerals that originated in the DRF Region. If so, information about the source and chain of custody of those 3TG minerals must also be disclosed.

UMP is taking steps to determine the origin and status of any 3TG minerals that may be necessary to our products' functionality or production. This includes reasonable due diligence to determine whether any such minerals originated in the covered countries and whether the minerals directly or indirectly benefit armed groups in the covered countries.

## Our Principles

UMP will work with our suppliers to understand the sourcing of any 3TG minerals that may be necessary to the production or functionality of our products. UMP does not directly purchase 3TG minerals from smelters or mines.

We will communicate with our suppliers our goals for transparency and seek to obtain information concerning the origin of 3TG minerals.

We will seek information from suppliers through survey letters and/or the use of the Electronic Industry Citizenship Coalition ("EICC") Conflict Minerals Reporting Template.

We expect our suppliers to be aware of the supply chain due diligence requirement and to respond in a timely manner to UMP's requests for information. Specifically, we expect that our suppliers will:

- Work with their own suppliers to identify the chain of custody of any 3TG minerals (including the country of origin, smelter, refiner and/or mine from which the conflict minerals originate);
- Cooperate with UMP in connection with any due diligence that we choose to perform with respect to its country of origin inquiries;
- Provide, upon request, reasonable proof of the due diligence performed by the supplier to support any country of origin or sourcing certification provided to UMP; and

<sup>1</sup> Conflict minerals or "3TG minerals" are defined in Section 1502 of the Dodd-Frank Act as columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), gold and any other minerals that the U.S. Secretary of State may designate in the future.

<sup>2</sup> The DRC region or "covered countries" include the Democratic Republic of Congo, Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.



## Conflict Minerals Policy Statement

**Universal Metal Products, Inc.**  
29980 Lakeland Blvd.  
Wickliffe, Ohio 44092  
(440) 943-3040  
Solutions@ump-inc.com

- Advise UMP of any determination that products or materials in the supply chain are not DRC conflict free.

We encourage our suppliers to adopt similar policies and management systems with respect to conflict minerals. We recognize that our compliance with these obligations will require time and effort from the members of our supply chain. However, we expect that suppliers will take reasonable, good faith steps toward assisting UMP in achieving its compliance obligations.

<sup>1</sup> Conflict minerals or "3TG minerals" are defined in Section 1502 of the Dodd-Frank Act as columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), gold and any other minerals that the U.S. Secretary of State may designate in the future.

<sup>2</sup> The DRC region or "covered countries" include the Democratic Republic of Congo, Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.