

Triax Metal Products Conflict Minerals Policy

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law. The Dodd-Frank Act and related U.S. Securities and Exchange Commission rules require certain companies to disclose the extent to which the products they manufacture or contract to manufacture contain so-called conflict minerals sourced from mines in the Democratic Republic of the Congo ("DRC") or adjoining countries.

Conflict minerals

Currently, the list consists of only four minerals:

- **Columbite-tantalite** (or *coltan*, the colloquial African term) is the metal ore from which the element **tantalum** is extracted. Tantalum is used primarily for the production of capacitors, particularly for applications requiring high performance, a small compact format and high reliability, ranging widely from hearing aids and pacemakers, to airbags, GPS, ignition systems and anti-lock braking systems in automobiles, through to laptop computers, mobile phones, video game consoles, video cameras and digital cameras.^[5] In its carbide form, tantalum possesses significant hardness and wear resistance properties. As a result, it is used in jet engine/turbine blades, drill bits, end mills and other tools.
- **Cassiterite** is the chief ore needed to produce **tin**, essential for the production of tin cans and solder on the circuit boards of electronic equipment.^[6] Tin is also commonly a component of biocides, fungicides and as tetrabutyl tin/tetraoctyl tin, an intermediate in polyvinyl chloride (PVC) and high performance paint manufacturing. Tin plating was—and remains—the most important use of tin. It involves applying a very thin protective coating of tin to other materials, such as steel and copper, either by dipping them into molten tin or by electroplating. The dull, tin oxide that forms on the surface of the tin plate protects both the tin and the material it covers up.
- **Wolframite** is an important source of the element **tungsten**. Tungsten is a very dense metal and is frequently used for this property, such as in fishing weights, dart tips and golf club heads. Like tantalum carbide, tungsten carbide possesses hardness and wear resistance properties and is frequently used in applications like metalworking tools, drill bits and milling. Smaller amounts are used to substitute lead in "green ammunition".^[7] Minimal amounts are used in electronic devices, including the vibration mechanism of cell phones.
- **Gold** is used in jewelry, electronics, and dental products. It is also present in some chemical compounds used in certain semiconductor manufacturing processes.

Triax Metal Products fully supports this legislation and its position to avoid the use of conflict minerals mined from the DRC and adjoining countries.

In addition:

- Triax expects our suppliers to source materials from socially responsible suppliers.
- Triax expects all of its suppliers to comply with the Dodd-Frank regulation and provide all necessary declarations.
- Suppliers must pass this requirement through the supply chain and determine the source of specified minerals.
- Suppliers who are non-compliant to these requirements shall be reviewed by our purchasing managers for future business.

Triax Metal Products fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a conflict free supply chain.