



2550 MIDDLE ROAD – SUITE 503
BETTENDORF, IA 52722 U.S.A
PHONE: (563)-355-2722
FAX: (563)-359-7984
E-MAIL: alloys@simametals.net

Background

Sovereign International Metals & Alloys, inc (SIMA) maintains its strong commitment to responsible sourcing and supports the goals and objectives of Section 1502 of the Dodd-Frank Act (the Act), which aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries as defined in the Act (Covered Countries). Conflict minerals include: columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives and other minerals or derivative elements determined by the U.S. Secretary of State to be financing the DRC conflict.

SIMA's Actions

The Act requires companies to perform due diligence with respect to the sourcing of conflict minerals. SIMA complies with the diligence and reporting obligations required under the Act. In addition, SIMA follows the direction and guidance given by the EICC-Conflict Free Sourcing Initiative ("CFSI")'s Smelter Engagement and GeSI.

SIMA's Responsibilities

SIMA will only buy, trade and sell Conflict Free Materials as documented by the above-mentioned organizations. In addition we will support our customers in the required reporting rules they place upon us.

A handwritten signature in black ink, appearing to read "Steve J. G.", is written over a horizontal line.

Signed: _____ Position: President

This revision dated: January 6, 2014, Rev 1