



CONFLICT MINERALS - PROCUREMENT POLICY

In recent years, there has been an increasing international focus on “conflict minerals” emanating from mining operations in the Democratic Republic of the Congo (DRC) and adjoining countries. Armed groups engaged in mining operations in this region are believed to subject workers and indigenous people to serious human rights abuses and are using proceeds from the sale of conflict minerals to finance regional conflicts.

In response to these concerns, the United States Congress enacted provisions within the Dodd-Frank Act that require disclosures about the use of specified conflict minerals originating from the DRC and nine adjoining countries (covered countries).

Section 1502 of the Dodd-Frank Act is applicable to all public companies that file reports with the Securities and Exchange Commission (SEC). The law requires companies that manufacture or contract to manufacture products for sale to third parties to determine if conflict minerals are necessary to the functionality or production of the product and if so, trace the minerals back to their source and report the results to the SEC.

Conflict minerals are defined as cassiterite, columbite-tantalite (colton), gold and wolframite, as well as their derivatives, which are presently limited to tantalum, tin and tungsten, that are financing armed conflict in one of the Covered Countries.

WireCo WorldGroup has conducted an analysis of all products the company manufactures or contracts to manufacture and has determined that to the extent one of these minerals appear in WireCo WorldGroup products, the mineral did not originate from a Covered Country.

To ensure the company’s products remain free of conflict minerals, WireCo WorldGroup will perform regular reviews on all products and processes involved in manufacturing. Further, WireCo WorldGroup will communicate this requirement to our suppliers.