



Conflict Minerals Declaration

September 22, 2015

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and the United States Securities and Exchange Commission (SEC) now require U.S. public companies to report on the origin of minerals commonly used in the electronics industry, specifically tin (Sn), tantalum (Ta), tungsten (W) and gold (Au).

These minerals are called conflict minerals because they are found in regions where forced labor and other human rights abuses are used to mine these minerals and finance armed conflict, specifically in the Democratic Republic of the Congo (DRC) and its adjoining countries. The goal of the rule is to motivate manufacturers to ensure that these minerals come from conflict free sources and to prevent armed groups from benefiting from the use of force and human rights abuses.

The following elements of our management system support the execution of the Kester Conflict Minerals Program.

- Kester only uses tin (Sn) as an alloy component for solder paste; solder bar and solder wire products.
- Kester is committed to sourcing responsibly and considers mining activities that fuel conflict as unacceptable.
- Beginning in 2009 Kester has participated in the research project conducted by RESOLVE (www.resolve.org) for the Electronic Industry Citizenship Coalition® (EICC®, www.eicc.info) and the Global e-Sustainability Initiative (GeSI, www.gesi.org) to positively influence social and environmental conditions in the minerals supply chain.
- Kester will continue to undertake reasonable due diligence within our supply chain to assure that tin (Sn) alloy material is not procured as a "Conflict Mineral."
- Kester's efforts related to conflict minerals are aligned to the work of the Electronic Industry Citizenship Coalition® (EICC®) and Global e-Sustainability Initiative (GeSI). The EICC's and GeSI's work includes the Conflict-Free Smelter Program and the Conflict Minerals Reporting Template ("Template").
- Kester uses the iPoint Conflict Minerals Platform (iPCMP) which was selected by our parent company Illinois Tools Works Inc. ("ITW") as the online tool to exchange company-level data and smelter data up and down the supply chain.
- Individual Conflict Minerals statements and certifications from our major tin suppliers have been attached to this declaration form for your information.

A handwritten signature in blue ink that reads "T DiDomenico".

Tony DiDomenico
Product Compliance
Environmental Health & Safety
Kester Global Operations

customerservice@kester.com
630.616.6844 - Phone



An initiative of the EICC and GeSI

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Revision 4.01a
August 6, 2015

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). The information collected in this template should be updated annually. Any changes within the annual cycle should be provided to your customers

Company Information

Company Name (*):	KESTER Inc. Kester Components Pte Ltd.
Declaration Scope or Class (*):	A. Company
Description of Scope:	KESTER is a manufacturer of soldering wire, bar solder, Solderforms®, and soldering paste containing tin.
Company Unique ID:	14-722-2785
Company Unique ID Authority:	DUNS
Address:	800 W. Thorndale Avenue Itasca, Illinois 60143 500 Chai Chee Lane Singapore 469024
Contact Name (*):	Tony DiDomenico - KESTER
Email - Contact (*):	tdidomenico@kester.com
Phone - Contact (*):	630.616.6844 - Phone 630.616.4044 - Fax
Authorizer (*):	Tony DiDomenico - KESTER
Title - Authorizer:	Product Compliance / Environmental Health & Safety
Email - Authorizer (*):	tdidomenico@kester.com
Phone - Authorizer (*):	630.616.6844 - Phone
Effective Date (*):	22-Sep-2015

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is the 3TG intentionally added to your product? (*)	Answer	Comments
Tantalum (*)	No	KESTER is a manufacturer of soldering wire, bar solder, Solderforms®, and soldering paste containing tin.
Tin (*)	Yes	
Gold (*)	No	
Tungsten (*)	No	

2) Is the 3TG necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)	Answer	Comments
Tantalum (*)	No	KESTER is a manufacturer of soldering wire, bar solder, Solderforms®, and soldering paste containing tin.
Tin (*)	Yes	
Gold (*)	No	
Tungsten (*)	No	

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (*)	Answer	Comments
Tantalum		The following smelters are known to KESTER as sourcing from the covered countries. They are verified as compliant with the Conflict-Free Smelter Program (CFSP) assessment protocol. - Malaysia Smelting Corporation (MSC) - Thaisarco
Tin (*)	Yes	
Gold		
Tungsten		

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum		
Tin (*)	No	
Gold		
Tungsten		

5) Have you received data/information for each 3TG from all relevant suppliers? (*)	Answer	Comments
Tantalum		Yes, received Conflict Minerals Declaration Statements. (see Kester Conflict Minerals Declaration located on www.kester.com)
Tin (*)	Yes, 100%	
Gold		
Tungsten		

6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum		Yes, received Conflict Minerals Declaration Statements. (see Kester Conflict Minerals Declaration located on www.kester.com)
Tin (*)	Yes	
Gold		
Tungsten		



An initiative of the EICC and GeSI

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Wählen sie hier die Sprache:

Selezione el lenguaie de preferencia aqui:

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Conflict Minerals Reporting Template (CMRT)

English

[Click here to check required fields completion](#)

Revision 4.01a
August 6, 2015

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[Link to Terms & Conditions](#)

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7) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin (*)	Yes	Yes, received Conflict Minerals Declaration Statements. (see Kester Conflict Minerals Declaration located on www.kester.com)
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Do you have a policy in place that addresses conflict minerals sourcing? (*)	Yes	Kester Conflict Minerals Declaration is located on www.kester.com
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	http://www.kester.com/downloads/environmental
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Yes, received Conflict Minerals Declaration Statements.
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	Yes, received Conflict Minerals Declaration Statements.
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Yes, received Conflict Minerals Declaration Statements.
F. Do you collect conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755 Conflict Minerals Data Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]? (*)	Yes	Yes, received Conflict Minerals Declaration Statements.
G. Do you request smelter names from your suppliers? (*)	Yes	Yes, received Conflict Minerals Declaration Statements.
H. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Yes, received Conflict Minerals Declaration Statements.
I. Does your review process include corrective action management? (*)	Yes	Yes, received Conflict Minerals Declaration Statements.
J. Are you subject to the SEC Conflict Minerals rule? (*)	Yes	Illinois Tool Works (ITW), our parent company, completes SEC reporting and Form SD filing.

All Tin (Sn) Suppliers below are on the Compliant or Active Smelter List

Smelter Name (*)	Smelter Country (*)	Smelter Identification	Smelter City	Smelter Facility Location: State / Province
Malaysia Smelting Corporation (MSC)	MALAYSIA	CID001105	Butterworth	Penang
Minsur	PERU	CID001182	Paracas	Ica
PT Timah (Persero) Tbk Mentok	INDONESIA	CID001482	Mentok	Bangka
PT Refined Bangka Tin	INDONESIA	CID001460	Sungailiat	Bangka
EM Vinto	BOLIVIA	CID000438	Oruro	Cercado
Thaisarco	THAILAND	CID001898	Amphur Muang	Phuket
Yunnan Chengfeng Non-ferrous Metals Co.	CHINA	CID002158	Gejiu	Yunnan
Fenix Metals	POLAND	CID000468	Chmielów	Subcarpathian Voivodeship
PT Babel Inti Perkasa	INDONESIA	CID001402	Lintang	Bangka
PT Bangka Tin Industry	INDONESIA	CID001419	Sungailiat	Bangka
PT ATD Makmur Mandiri Jaya	INDONESIA	CID002503	Sungailiat	Bankga
PT Mitra Stania Prima	INDONESIA	CID001453	Sungailiat	Bangka
PT Bukit Timah	INDONESIA	CID001428	Pangkal Pinang	Bangka

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MSC POLICY ON CONFLICT MINERALS

MSC is a major global integrated tin producer with exploration, mining, smelting and marketing business divisions. The Company's custom tin smelter located in Penang, Malaysia generally sources its feed material comprising primary tin concentrates, crude tin and secondary tin bearing material from all over the world. It is the Company's policy to conduct its custom smelting business in a responsible and ethical manner.

Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act signed into law¹ by President Obama on July 21st 2010 defines 'Conflict Minerals' as including 'cassiterite and its derivatives' along with two other minerals and gold. MSC supports the objectives of this law, to progressively reduce the link between mining and conflict in the eastern Provinces of the Democratic Republic of Congo (DRC) and recognises the disclosure requirements which this law imposes on SEC reporting companies in the US.

MSC has been purchasing tin concentrates from Central African countries for several years and is fully aware that thousands of miners and their dependents in the DRC and the surrounding region rely on the tin production and trade, as do thousands more employed in associated services such as transportation. We will participate in solutions that aim to address the conflict mineral issues to ensure that the trade will continue and in compliance with requirements of the international community.

Currently between 15-20% of the tin we produce is sourced from predominantly artisanal miners in Central Africa. The majority of the smelter intake from Central Africa is currently from Rwanda and from the southern Katanga Province of the DRC that is not within the recognised conflict areas of Eastern DRC. MSC, as a leading member of the tin association ITRI, has been pro-active in developing the ITRI Tin Supply Chain Initiative (iTSCi) traceability and due diligence system designed to differentiate between conflict and non-conflict sources in high risk areas and promote progressive improvement of the circumstances of mining. All tin concentrates purchased by MSC from Rwanda and Katanga is obtained through the iTSCi programme and therefore according to internationally recognised due diligence guidance.

Both the Organisation for Economic Co-operation and Development (OECD)² and the United Nations (UN)³ have released broadly similar guidelines for company due diligence on minerals from conflict affected and high risk areas, and in the case of the UN, specifically for the DRC. The US Department of State has endorsed the OECD guidance and encourages companies to draw upon it as they establish their due diligence practices⁴. These guidelines outline actions that will allow trade to continue while promoting responsible sourcing and progressive improvement.

MSC considers 'DRC conflict free' cassiterite to be that which has been sourced according to OECD due diligence procedures aimed to reduce trade that may directly or indirectly finance or benefit armed groups in the DRC and/or in adjoining countries; Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia. This is the position supported by a wide range of stakeholders (Government, NGO's and industry) and communicated to the US SEC earlier in 2011⁵.

MSC is also committed to meeting the requirements of Governments of the affected countries and subscribes to a longer term sustainability objective of improving the tin mining industry of DRC and Rwanda. In this respect the Company is involved in the process of establishing, either unilaterally and/or on a joint venture basis with private companies as well as Governments, industrial size mining projects in these countries.

RELEVANT COMPANY AND ASSOCIATION ACTIONS

MSC recognises the concerns of the international community regarding minerals which may fund conflict and the need to have a strong organizational structure to deal with such concerns. We have ensured all relevant personnel within our company are aware of the US Dodd Frank law, as well as the due diligence guidance of the OECD and the UN.

We strive to take all reasonable steps to abide by all relevant regulations or operating guidance and have also made our suppliers aware of these frameworks. All our current smelting contracts have a specific clause relating to due diligence requirements.

We also communicate this policy with regular update on development and progress of the various due diligence and smelter audit (CFS) schemes to our customers.

The relevant Ministry within the Government of Malaysia has been kept updated on the various developments since 2009.

This policy statement together with other relevant information on the company actions and involvement in striving to address the concerns of various conflict mineral issues are hosted on the company website (<http://www.msmelt.com>)

As early as October 2008, we recognised issues with tin supply from the DRC and committed, as a member of the global tin association ITRI, to a policy on artisanal and small scale mining⁶. This was followed in October 2009 by the ITRI Member Declaration on Artisanal and Small Scale Mining (ASM) that included a commitment by each member company not to purchase cassiterite known or suspected to have originated in the DRC unless participating in, and complying with, the current requirements of the ITRI Tin Supply Chain Initiative (iTSCI).

MSC fully supports the aims of iTSCI to differentiate between minerals trade that may be funding conflict, and the trade that is not, in order to allow artisanal mining to continue when possible, and to avoid a complete embargo on the region. We abide by the requirements of the iTSCI programme membership agreement, including recognition of the Annex II model supply chain policy recommended by the OECD, and make in-kind and financial contributions to the programmes' support and development. We consider that 'conflict minerals' can most effectively be controlled at source, rather than at the point of smelting.

ITRI holds Memoranda of Understanding, and works closely with the Governments of the DRC, Rwanda, and Burundi, as well as the ICGLR (International Conference of the Great Lakes Region) who all recognise the iTSCI due diligence system as appropriate for use in their countries.

Both MSC and ITRI have worked as key participants in the OECD multi-stakeholder working group to develop the guidance document since December 2009.

ITRI has also participated in discussions with relevant offices of US Congressmen, a roundtable hosted by the European Parliament, as well as providing a range of comments to the SEC.

MSC and ITRI have also supported and worked with the Global e-Sustainability Initiative (GeSI)⁷ and Electronic Industry Citizenship Coalition® (EICC)⁸ since early 2009 and have provided advice to improve the conflict-free smelter (CFS) programme. MSC will participate in the CFS audits once an audit protocol and associated procedures have been developed.

Through a combination of all the above efforts, and in close co-operation with Governments and NGOs, as a leading member of the tin production industry, MSC therefore aims to achieve three goals:

- 1. We will not trade in cassiterite that directly or indirectly finances or benefits armed groups in the DRC and/or adjoining countries, and***
- 2. We will promote ways for legitimate minerals from the region to enter the global supply chain, thereby supporting the economy of the region and the local communities that depend on this trade.***
- 3. We will promote sustainable development of the tin industries in DRC and Rwanda through investments in industrial scale exploration, mining, processing and smelting of tin and associated minerals resource.***

CERTIFICATE OF ACTUAL ANALYSIS

This is to certify that **MSC STRAITS REFINED TIN (99.85% Sn.Min.)** as undernoted was delivered and signed for as being in good order and condition ex our Smelting Works in Butterworth, Penang, Malaysia.

To : **YUNTINIC RESOURCES INC**

On : **11TH. AUGUST 2014**

Per : **DESPINA P V.HE432A / MSC BRUXELLES V.FG432A**

For shipment to : **BALTIMORE, USA**

Brand : **MSC**

Container / Seal No. : **MSCU 1385726 - FEJ 4062226 GATU 0989410 - FEJ 4062240
MEDU 2887704 - FEJ 4062206 MEDU 1665261 - FEJ 4062228
MEDU 2203020 - FEJ 4062213**

Marking : **YR
1 - 125**

Lot No.	L. 075	Lot No.	L. 076	Lot No.	L. 077	Lot No.	L. 078
Sn	99.860 %	Sn	99.864 %	Sn	99.867 %	Sn	99.867 %
As	0.010 %	As	0.015 %	As	0.014 %	As	0.014 %
Pb	0.047 %	Pb	0.046 %	Pb	0.045 %	Pb	0.044 %
Bi	0.020 %	Bi	0.018 %	Bi	0.017 %	Bi	0.016 %
Cu	0.034 %	Cu	0.032 %	Cu	0.033 %	Cu	0.033 %
Sb	0.015 %	Sb	0.012 %	Sb	0.011 %	Sb	0.012 %
Fe	0.007 %	Fe	0.007 %	Fe	0.007 %	Fe	0.008 %
Ni	0.004 %	Ni	0.004 %	Ni	0.003 %	Ni	0.003 %
Co	0.002 %	Co	0.002 %	Co	0.002 %	Co	0.002 %
Ag	0.001 %	Ag	0.000 %	Ag	0.001 %	Ag	0.001 %
Zn	< 0.0010 %	Zn	< 0.0010 %	Zn	< 0.0010 %	Zn	< 0.0010 %
Cd	< 0.0010 %	Cd	< 0.0010 %	Cd	< 0.0010 %	Cd	< 0.0010 %
Al	< 0.0010 %	Al	< 0.0010 %	Al	< 0.0010 %	Al	< 0.0010 %

This result of the actual analysis provided above is obtained from MSC'S laboratory. It is provided as a guidance for buyers and consumers only and does not constitute as a guarantee by MSC for the individual elements stated. Nevertheless, we also certify that the Company's brand of Straits Refined Tin is of good merchantable quality and that the production batch from which the tin has been drawn, has a tin content of not less than 99.85% and conforms to the ASTM Grade A specification B339-00 (Reapproved 2010) and the British Specification BS EN610:1996.

MALAYSIA SMELTING CORPORATION BERHAD



Authorized Signature

*Strapping weight is approximately 1 kg per bundle

**1 bundle consists of 34 ingots



CONFLICT MINERAL POLICY STATEMENT

Minsur S.A. is a leading member of the tin production industry with facilities to mine, concentrate and smelt cassiterite, the common ore of tin, and also to refine tin metal from our own tin concentrate.

Minsur S.A. considers 'Democratic Republic of Congo (DRC) conflict free' cassiterite to be that which has been sourced according to recognised Organisation for Economic Co-operation and Development (OECD) "due diligence" procedures aiming to reduce trade that may directly or indirectly finance or benefit armed groups in the DRC and/or in adjoining countries.

We have assessed our sources and suppliers of minerals according to the OECD guidance and consider that the need for further "due diligence" is not required. Minsur S.A. does not source cassiterite from the DRC or adjoining countries or use suppliers that do so, since we source entirely from our own mine in Peru.


Although not sourcing cassiterite from the DRC or adjoining countries, we have made relevant personnel within Minsur S.A. such as smelter managers and supervisors as well as commercial and logistic staff, aware of the 'conflict minerals' law of the United States and the recommendations of the OECD, in particular Annex II. We also communicate this policy to our customers through our commercial manager and commercial agents.

Minsur S.A. acknowledged issues with tin supply from the DRC and committed, as a member of the global tin association ITRI, to comply with a policy on artisanal and small scale mining that includes a commitment by each member company not to purchase cassiterite known or suspected to have originated in the DRC. We fully support ITRI's Tin Supply Chain Initiative (iTSCi) programme to differentiate between minerals trade that may be funding conflict, and the trade that is not, in order to allow artisanal mining to continue when possible.

Through a combination of these efforts, and in close co-operation with Governments and NGOs, despite having no direct involvement in purchasing from the DRC, but as a leading member of the tin production industry, Minsur S.A. therefore aims to contribute to the achievement of three goals:

1. To develop a sustainable tin industry,
2. To avoid the trade in cassiterite that directly or indirectly finances or benefits armed groups in the DRC and/or adjoining countries, and
3. To support ways for legitimate minerals from the conflict region to enter the global tin supply chain.

Lima, 19th September 2012



Lucio Pareja Chávez
General Manager



MINSUR S.A.

TIN METAL

ANALYSIS CERTIFICATE LFS-0958

Brand : MINSUR Date : Oct. 2, 2013
Lot N° : 13S270958
N° of Ingots : 800
N° of Bundles : 20
Gross Weight (Kg) : 20,112.6
Net Weight (Kg) : 20,074.6

CHEMICAL ANALYSIS

Tin	(Sn)	:	99.949 %
Antimony	(Sb)	:	0.0179 %
Copper	(Cu)	:	0.0024 %
Lead	(Pb)	:	0.0178 %
Iron	(Fe)	:	0.0013 %
Bismuth	(Bi)	:	0.0031 %
Arsenic	(As)	:	0.0007 %
Zinc	(Zn)	:	0.0004 %
Aluminium	(Al)	:	0.0004 %
Cadmium	(Cd)	:	0.0002 %
Sulphur	(S)	:	0.0001 %
Nickel	(Ni)	:	0.0001 %
Cobalt	(Co)	:	0.0001 %
Silver	(Ag)	:	0.0001 %

We hereby certify the above analysis and confirm that the Tin metal conform to the international standards BS EN 610 : 1996 and ASTM - B339 - 00 (2005)

MINSUR S.A. - PISCO

OPERATION SUPERINTENDENT

Ivo Serkovic Gómez
INGENIERO METALURGISTA
Reg. del Colegio de Ingenieros N° 25480

SL-001 Ver. 00



Letter of Statement Conflict Mineral Policy

This statement is made to straighten out and avoid misconstrued information that has been circulated in Indonesia tin mining industry. PT TIMAH (Persero) Tbk hereby stated that:

1. PT TIMAH (Persero) Tbk is a State Owned Enterprise that listed on the Indonesia Stock Exchange and adopted a Corporate Social Responsibility Program and adhere to standard Good Corporate Governance as prescribed and comply with Indonesian Capital Market Supervisory Agency (Bapepam) regulation.
2. As a State Owned Enterprises, our mining practice and production operations are closely monitored by Ministry of Energy and Natural Resources, Ministry of Trade and Industry with strict adherence to the prevailing laws and regulation of the Republic of Indonesia.
3. All operating activities of PT TIMAH (Persero) Tbk follows the procedures of 'good mining practices' in which has been regulated by the Government of Republic of Indonesia, whose mining rights has been granted by Indonesia government to PT TIMAH (Persero) Tbk.
4. With respect to the presence of article concerning "Death Metal", PT TIMAH (Persero) Tbk does not condone any ilegal tin mines activities neither in the tin industry nor any other industry.
5. PT TIMAH (Persero) Tbk never purchased nor processed any minerals that originating from conflict areas elsewhere in the world, including Democratic Republic of Congo.

Thus, this statement is made as an attempt to avoid negative opinion from the existing of the ilegal miners in Indonesia to PT TIMAH (Persero) Tbk that pointed out by Non Governmental Organizations (NGO) and media reports regarding to any negative issue on tin mining operation in indonesia.

Jakarta, 24 March 2014

PT TIMAH (Persero) Tbk

The TIMAH logo is shown again, with a handwritten signature in blue ink over it.

Agung Nugroho

Corporate Secretary

Head Office :

Jalan Jenderal Sudirman No. 51, Pangkalpinang 33121 Bangka - Indonesia
Telepon +62(717) 431335 (Hunting), Fax. +62(717) 432323
Telex. 27700 TIMAH IA

E-mail : timah@pt.timah.co.id

Homepage : <http://www.pttimah.com>

Representative Office :

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Telepon +62(21) 310-1185 (Hunting), Fax. +62(21) 310-1187



LETTER OF STATEMENT

To whom it may concern

This is to inform that Tin Ingot (Banka Pb100 TIN INGOT 10 MT), was produce in Indonesia and shipped by us from Muntok – Indonesia to Singapore below are of **INDONESIAN ORIGIN**.

- 1. Vessel name : TB SD EMERALD / BG.SINDO FALCON
V.743 SN & 747 SN
- 2. ETD Muntok : April 23 and May 25. 2014
- 3. Etd Singapore : April 30. 2014 and June 03.2014
- 4. Country Of final Destination : Singapore
- 5. BL NO. : SF743SIN01 & SF747SIN01
- 6. Marks & Numbers/Description Of goods :

INVOICE NO.	MARKS NO.	BDL NO.	NO OF BDL S.	TOTAL INGOTS	NET WEIGHT	GROSS WEIGHT
3000007694/INV/2014	GREEN	0111	5	195	5.000 KGS	5.005 KGS
3000007733/INV/2014	BLUE	0154	5	195	5.000 KGS	5.005 KGS
		TOTAL	10	390	10.000 KGS	10.010 KGS

Pangkalpinang, August 11, 2014

PT TIMAH (PERSERO) TBK

Head of Marketing,


RIA W PAWAN

TIMAH

Conflict Minerals Control Policy

PT Refined Bangka Tin (RBT) is a tin smelter who produces high grade LME registered tin ingot under the brand 'RBT'. For production process, it is our policy to use tin concentrates locally, which is 100% supplied from domestic source in Indonesia.

Our activities, as an Indonesian mining company, must follow the procedures of 'good mining practices' in which has been regulated by the Government of Republic of Indonesia. RBT is also committed to offer a safe environment to the employees and the local society, and follows the government regulations to ensure safe and responsible work practices.

Conflict Minerals and Metals are materials, which through their mining, production or supply have either knowingly or inadvertently been of benefit to the illegal armed groups in the Democratic Republic of the Congo (DRC) and its adjoining countries. The materials defined are gold, tin, tantalum, tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, as stated in Section 1502 of the *US Dodd-Frank Wall Street Reform and Consumer Protection Act (July 21st, 2010)*.

It is also our policy to never use nor processed any minerals that originating from conflict areas, including Democratic Republic of Congo. All such materials are excluded from RBT's product and supply chain. Therefore RBT's product is categorized as conflict free.

We fully support Conflict Free Smelter Program (CSFP). By participating in the CFSP, we aim to achieve the zero conflict minerals in our supply chain and provide assurance to our customers that our Tin Ingot and products are conflict free.

We strongly encourage all organizations who is involved in tin mining, manufacturing, or tin products to join us in keeping conflict minerals out of our supply chain.

Effective date: August 4th, 2014

STATEMENT Conflict Mineral Policy

This statement is made as a response to the issue of Conflict Minerals and Materials, where mining industries have been made aware to activities that have either knowingly or inadvertently been of benefit to the illegal armed groups in the Democratic Republic of the Congo (DRC) and its adjoining countries.

Following this issue, PT Refined Bangka Tin hereby stated its position:

1. PT Refined Bangka Tin is a tin mining company in Indonesia, in which its mining practices and production strictly comply to the prevailing laws and regulations of the Republic of Indonesia.
2. PT. Refined Bangka Tin only use material of tin concentrates sourced from the Republic of Indonesia.
3. PT. Refined Bangka Tin only receives materials through their designated concession partners in Indonesia.
4. PT Refined Eangka Tin never receives nor processes materials that originating from conflict areas, including the Democratic Republic of Congo (DRC), Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, Angola, Congo, Central African Repubiic, or any other conflict areas in the world.
5. PT Refined Bangka Tin does not condone any illegal activities within the tin industry or in any other industries.

PT Refined Bangka Tin encourages all organizations involved in tin mining, manufacturing, or tin products, to maintain a conflict free product and activities chain, and strictly follow the laws and regulations from the government.

Sungailiat, September 4th, 2014

PT Refined Bangka Tin

Anton Salim Tjiu
Director

CONNECT WITH US



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Jakarta - Indonesia 12190
Phone: +62 21 5150553
Fax: +62 21 5150554



La Empresa Metalúrgica Vinto (EMV) bajo la administración del estado boliviano, tiene como principal actividad la fundición de concentrados de estaño que son abastecidos por minas Bolivianas. Utilizando diferentes procesos metalúrgicos para obtener lingotes de estaño de alta pureza, aplicando procedimientos productivos consistentes y sostenibles con las buenas prácticas de producción.

Como empresa, adoptamos esta Política - Integrada y de Minerales libres de Conflicto - y asumimos el compromiso de cumplirla convencidos que la calidad de nuestro trabajo, la transparencia en nuestra cadena de suministro, la satisfacción de nuestros clientes, la salud, la seguridad de nuestro personal y de todos con quienes nos relacionamos, la conservación y cuidado del medio ambiente, así como el respeto a los derechos humanos son parte fundamental del éxito de nuestra empresa y del bienestar de nuestra comunidad.

En consecuencia expresamos públicamente la decisión de realizar nuestras actividades en el marco de los siguientes compromisos:

Establecer y asegurar los recursos (humanos, económicos, naturales u otros) necesarios para implementar, mantener y mejorar el Sistema de Gestión Integrado para el cumplimiento de los requisitos de las Normas ISO 9001, ISO 14001, OHSAS 18001 y el Programa "Fundiciones Libres de Conflicto (CFS de sus siglas en inglés)".

Cumplir con las disposiciones legales y otros requisitos vigentes en materia de Seguridad Industrial, Salud Ocupacional, Medio Ambiente, Calidad y Minerales libres de Conflicto, así como los compromisos adquiridos con las partes interesadas.

Abstenerse de realizar toda acción que directa o indirectamente financie o beneficie a grupos armados de la República Democrática del Congo y/o de los países limítrofes.

Adoptar, difundir ampliamente e incorporar con proveedores la siguiente política de abastecimiento responsable de concentrados de estaño, la cual representa un punto de referencia común para las prácticas de abastecimiento sensibles al conflicto y al riesgo, al igual que para la identificación de riesgos por parte de los proveedores.

Prevenir, controlar y minimizar; los riesgos, lesiones y daños a la salud de las personas y bienes; la contaminación del medio ambiente generados en nuestras operaciones.

Cumplir y evaluar nuestros objetivos planteados mejorando continuamente nuestro Sistema de Gestión Integrado, a través de revisiones periódicas.

Establecer las medidas necesarias que permitan al personal cumplir con los derechos laborales y sociales, el deber y la obligación para detener y reportar cualquier acto y/o condición sub estándar que pueda causar pérdidas o daños a personas, bienes y/o al medio ambiente.

Impulsar al desarrollo de los recursos humanos que forman parte de nuestra empresa, a través de capacitación continua.

Difundir la presente Política a todo el personal y mantenerla permanentemente a disposición del público.



Empresa Metalúrgica Vinto

Laboratorio de Ensayos Vinto

R-LEV-13

PHONES 591 - 2 - 5278102
5278103
FAX 591 - 2 - 5278024

QUALITY CONTROL (CONTROL DE CALIDAD)

P.O. BOX 612
(CASILLA 612)
Oruro - Bolivia

N°
122/2014



DATE: (FECHA)

Day	Month	Year
Día	Mes	Año
20	01	2014

Reporte Lab. 11:05

ASSAY REPORT (INFORME DE ENSAYO)

Sample (Muestra)

"ENAF" METALLIC TIN
(ESTAÑO METÁLICO "ENAF")
ORURO - BOLIVIA

Origin (Procedencia)

Assay Method (Método de Ensayo)

OPTICAL EMISSION (EMISION OPTICA)

Reception Date (Fecha recepción)

20/01/2014

Lot (Lote)

EMV-05/2014

Tin (Estaño) 99,967 % ± 0,0018

Refined tin of minimum 99,95% Sn purity grade A1 conforming to NB 1101003:2006
Incertidumbre expandida con K=2 y 96% de confiabilidad.

Normas de referencia: ASTM B 339; BS 3252:1960; DIN 1704/73; DGN B-24-1960;
JIS H 2108:1956.

Our tin metals is made from Bolivian ores.

CCM :-

Ing. Carina Canaza Murillo
JEFE DE LABORATORIO
EMPRESA METALÚRGICA VINTO

Ing. Job S. Yapura A.
JEFE DIV CONTROL CALIDAD
LMP METALURGICA VINTO

HEAD OF QUALITY CONTROL
(JEFE CONTROL DE CALIDAD)



บริษัท ไทยแลนด์สมอลติงแอนด์รีไฟนิง จำกัด Thailand Smelting and Refining Co., Ltd.

80 Moo 8 Sakdidej Road,
T.Vichit, A.Muang, Phuket 83000 THAILAND
Tel : (66 76) 371111 Facsimile : (66 76) 371121
E-mail : tsr@thaisarco.com

80 หมู่ 8 ถนนศักดิ์เดช ต.วิชิต อ.เมือง
จังหวัดภูเก็ต 83000
โทร. (076) 371111 โทรสาร. (076) 371121



Conflict Minerals Policy

The policy of **Thailand Smelting & Refining Co Ltd (Thaisarco)** is to completely exclude all Conflict Minerals and Metals from its supply chain.

Conflict Minerals and Metals are materials, which through their mining, production or supply have either knowingly or inadvertently been of benefit to illegal armed groups or are in any way contributing to conflict or human rights abuses.

All such materials are excluded from Thaisarco's supply chain and therefore from Thaisarco's products. Thaisarco's LME registered tin brands, "*Phuket*", and "*Thaisarco*" and all Thaisarco added value products can be categorised as conflict free.

Conflict areas cover the DRC and adjoining countries.

In particular, **Thaisarco's policy** to maintain conflict free status in the management of its supply chain is as follows:

1. The policy is to purchase materials only from reputable suppliers with whom long relationships have been established or on whom adequate due diligence in terms of know your supplier protocols can be carried out. Supplies may be as tin ore (concentrate), crude or unrefined tin, refined tin metal, including that from LME warehouses, and a variety of secondary or intermediate products.
2. In all cases due diligence will be conducted on the supplier and supply chain to ensure that the supply is genuine, legitimate and does not in any way contribute to conflict or human rights abuses.
3. Thaisarco complies at all times with both national and international law relating to Conflict Minerals, including UN Security Council Resolutions and the US Dodd Frank Act.
4. Thaisarco conforms with OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the Conflict-Free Smelter Program (CFSP) Supply Chain Transparency Smelter Audit Protocol for Tin and Tantalum (November 2013).

Thaisarco's policy is to differentiate itself by offering its customers and trading partners conflict free metals and products, so that the final customer in the supply chain can be confident its products are produced from metals which are conflict free.

David Wilkinson
Managing Director

11th September 2014



Heraeus Materials Technology GmbH & Co KG, Hanau, 01.07.2014

Statement on Conflict Minerals

Heraeus Materials Technology (HMT) is a business group within Heraeus involved in the processing worldwide of precious and platinum groups metals as well as a comprehensive range of special metals. As a social responsible company, we have a concern for the well-being of people and communities. We conduct our business fairly and ethically, respect human rights, comply with laws and regulations, and adhere to a rigorous Code of Conduct.

Conflict Minerals/Regulations

Columbite-tantalite (i.e., Tantalum), cassiterite (i.e., Tin), wolframite (i.e., Tungsten) and Gold, or their derivatives, (also referred to as "3TGs") are considered to be Conflict Minerals (3TGs) as they may directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo (DRC) or adjoining countries. Regardless of where they are sourced, processed or sold - the U.S. Securities and Exchange Commission (SEC) has adopted rules to implement reporting and disclosure requirements related to conflict minerals, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

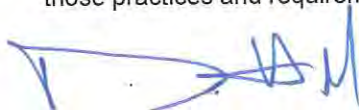
We support and share the goals and objectives of the SEC final rule for Section 1502 and we recognize that our direct and indirect customers are mandated to undertake due diligence across their global supply chains - on the other hand HMT does not file reports with the SEC and therefore we have no legislative obligations to comply with these requirements.

Affirmation

Based on our shared set of values and principles we shun from purchasing any materials containing conflict minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.

To this effect we have implemented a strong management system and executed reasonable due diligence compliant with the Organization for Economic Cooperation and Development (OECD) as defined in its „Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas“. We identify and assess risks and implement strategies to manage minerals and determine origin. We have established compliance requirements for direct suppliers with regard to implement controls, undertaking of appropriate sourcing efforts and releasing of data for information and reporting purposes. In addition, we conduct an annual global third party audit and publish the results in the yearly compliance Report available on our website.

HMT continues to work closely with its partners and supports them in fulfilling their reporting obligations. Furthermore, we align our efforts to those practices and requirements established by industry peers.



Dr. Hans-Joachim Dittloff
CEO HMT



Dr. Markus Neuhauser
Compliance Officer HMT



CFS Policy

CONFLICT MINERAL POLICY STATEMENT

Fenix Metals Sp. z o.o. is aware of the concern of its customers following the adoption by the US Securities and Exchange Commission (SEC) of a "final rule" pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act relating to the use of conflict minerals originating from the Democratic Republic of Congo (DRC) and adjoining countries, which currently include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Fenix Metals is a member of ITRI, the global tin trade association, which has led the iTSCi (ITRI Tin Supply Chain Initiative), assisting upstream companies purchasing from the affected countries to develop due diligence systems conforming with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas at a practical level and clearly tracking conflict-free cassiterite from DRC to the international market.

The raw materials purchased by Fenix Metals Sp. z o.o. are all secondary materials, being either waste or processed metals created during product manufacturing. We do not buy any tin mineral concentrates either from the DRC or any other source. As these secondary materials are from recycled and scrap sources, they can be described as 'DRC Conflict Free' according to the SEC rule. Please see page 228 of document 34-67716 (section E.4.c) dated Aug 22, 2012 at <http://www.sec.gov/rules/final.shtml>.

The metals and products made by Fenix Metals are 'DRC conflict free'.

December 2012, update policy February 2015

Chairman of the Board

OŚWIADCZENIE – POLITYKA CONFLICT MINERALS

Fenix Metals Sp. z o.o. (Spółka) jest świadoma obaw swoich klientów w związku z przyjęciem przez Amerykańską Komisję Papierów Wartościowych (SEC) "ostatecznej zasady" zgodnie z § 1502 tzw. ustawy Dodda-Franka oraz Ustawy o Ochronie Konsumentów, odnoszących się do wykorzystania minerałów konfliktu (conflict minerals) pochodzących z Demokratycznej Republiki Konga (DRK) i krajów sąsiednich, które obecnie obejmują Angolę, Burundi, Republikę Środkowoafrykańską, Republikę Konga, Rwandę, Sudan Południowy, Tanzanię, Ugandę i Zambię.

Fenix Metals Sp. z o.o. jest członkiem ITRI, globalnej organizacji handlu cyną, która rozpoczęła inicjatywę w zakresie łańcucha dostaw cyny iTSCi, wspierającą przedsiębiorstwa dokonujące zakupów w wyżej wymienionych krajach. Celem tej inicjatywy jest zbudowanie systemów kontrolnych, działających zgodnie z wytycznymi OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, mających na celu przejrzyste śledzenie przepływu nieobciążonego problemem conflict minerals kasyterytu z DRK na rynki międzynarodowe.

Wszelkie surowce nabywane przez Fenix Metals Sp. z o.o. są surowcami wtórnymi, czyli albo odpadami, albo przetworzonymi metalami, które powstały podczas wytwarzania produktów z tych metali. Spółka nie kupuje żadnych cynowych koncentratów mineralnych ani z DRK, ani z żadnych innych źródeł. Ponieważ nabywane przez Fenix Metals Sp. z o.o. materiały wtórne pochodzą z odzysku odpadów, można opisać je jako "wolne od konfliktu DRK" zgodnie z zasadami SEC. Szczegóły można znaleźć na stronie 228 dokumentu 34-67716 (rozdział E.4, c) z dnia 22.08.2012 pod adresem <http://www.sec.gov/rules/final.shtml>.

Metale i wyroby produkowane przez Fenix Metals Sp. z o.o. są wolne od konfliktu DRK.

Grudzień 2012, aktualizacja luty 2015

Prezes Zarządu



Conflict Minerals policy - December 2, 2013

Our subsidiary, PT. Bukit Timah and PT. Babel Inti Perkasa are companies located in Bangka and Belitung Island which engaged in the processing and refining of tin ore with commitment to process high quality Tin Ingot. PT. Bukit Timah is the first private smelter in Indonesia to be registered on London Metal Exchange (LME) with the brand "IMLI". PT Babel Inti Perkasa is also producing high quality Tin Ingot with brand "IMLI BELITUNG". We are highly committed to offer safe work environment to our employees and ensuring that our work practices are environmentally responsible. This policy is further reflected in our commitment to serving as an industry champion for a conflict-free supply chain.

According to Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act signed into law 1 by President Obama on July 21st 2010 which defines 'Conflict Minerals and Metals' as gold, tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite. Our company supports the objectives of the law to reduce the link between mining and conflict in the eastern provinces of the Democratic Republic of Congo (DRC) and adjoining countries and further the humanitarian goal of ending violent conflict there.

Conflict Minerals and Metals are materials (Gold, tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite) which through their mining, production or supply have either knowingly or inadvertently been of benefit to illegal armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries. All such materials are excluded from our supply chain and therefore from our LME registered Tin brand, "IMLI" and also "IMLI BELITUNG". PT. Bukit Timah and PT. Babel Inti Perkasa policy is to completely don't use any Conflict Minerals and Metal in the supply chain. Our material, which is Tin ore, is 100% supplied by domestic source in Indonesia. To achieve conflict free status in the supply chain management and to drive awareness throughout the industry so that all tin conflict materials are eliminated from its supply chain, PT. Bukit Timah and PT. Babel Inti Perkasa commits to the following actions

- - Purchase materials only from reputable suppliers. In all cases due diligence will be conducted on the supply chain to ensure that the supply does not contribute to conflict or human rights abuses. The origin of the materials is checked and verified for each shipment.
- - Immediately discontinue engagement with suppliers who pose a reasonable risk to be supporting conflict. We offer only conflict free products, so the final customer in the supply chain can be confident that our Tin Ingot are produced from material which are conflict free.
- - Comply at all times with applicable legislation such as, the U.S. [Dodd-Frank](#) Wall Street Reform and Consumer Protection Act (July, 2010), which encourages legitimate, conflict-free trade of minerals sourced from the Democratic Republic of the Congo (DRC) and the Great Lakes Region of Africa.
- - Communicate our ethical and sustainable sourcing policy to our suppliers, employees, customers, and relevant stakeholders and perform internal monitoring of our performance to these standards.

We strongly encourage all organizations involved in Tin mining, manufacturing, or the use of Tin products to join us in keeping conflict minerals out of our supply chain.

Policy Established: December 2, 2013

PT. Indra Eramulti Logam Industri

Address Gardu Induk PLN 5, Margomulyo, Tandes Lor

Surabaya, East Java Indonesia 60187 Phone: +62-31-2977777

Products

We produce the following Tin metals:

Tin Ingots

99.90%+ purity conforming to BS EN 610:1996 and ASTM B339 standards.

Minimum Order: 24 Mts

Tin Solders

Lead free Tin solders.

Conflict Mineral Policy

The policy of ATD is to completely reject all Conflict Minerals.

In support of this policy, ATD enforce the following actions:

1. We only smelt for tin minerals from Indonesia origin.
2. We only refine and process tin minerals from Indonesia origin.
3. We comply at all times with both national and international law relating to Conflict Minerals, including UN Security Council Resolutions and the US Dodd Frank Act.
4. ATD will NOT purchase any materials which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries

Sungailiat, 10th October 2014 (Rev-B)



NON-CONFLICT MINERALS POLICY

“**Conflict Minerals**” refers to minerals or other derivatives, particularly tin ore, mined in the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war, resulting in serious social and environmental abuses.

In July 2010, the United States passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502(b) of this law requires all US stock listed companies to disclose the usage of Conflict Minerals (Tin, Tantalum, Tungsten, and Gold . . . 3TG).

PT Mitra Stania Prima fully supports this legislation and the Electronic Industry Citizenship Coalition (EICC)/Global e-Sustainability Initiative (GeSI) position to assure that specified minerals are not being sourced from mines in the “Conflict Region”, which are controlled by non-government military groups. Consistent with the ‘OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas’, **PT Mitra Stania Prima** has adopted the EICC Due Diligence reporting process ensuring transparency in our supply chain.

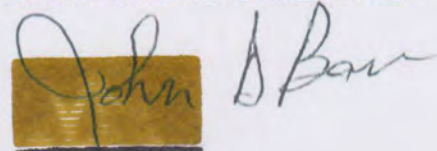
- Suppliers are expected to have policies and procedures in place to ensure that tin ore supplied to **PT Mitra Stania Prima** are ‘DRC Conflict-free’.
- Suppliers are expected to provide all necessary due diligence information to confirm that all tin ore supplied to **PT Mitra Stania Prima** is DRC Conflict-free.
- **PT Mitra Stania Prima** expects suppliers to pass this requirement on to their supply chain.
- Compliance to these requirements will be taken into consideration when selecting and retaining suppliers.

This Conflict Minerals policy is in line with the Global Business Initiatives on Human Rights, of which **PT Mitra Stania Prima** supports, and the framework of the United Nations Principles of Human Rights encouraging governments and businesses to respect, protect and remedy human rights.

DRC Conflict-free “means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups.

Sungailiat, January 8, 2015

Director of **PT. Mitra Stania Prima**



(John Dave Bass)