

CONFLICT MINERALS POLICY STATEMENT

In August 2012, the U.S. Securities and Exchange Commission (SEC) adopted the Conflict Minerals Final Rule to implement Section 1502 of the Dodd-Frank Act, which requires all U.S. publicly traded companies to file disclosures and reports with the SEC related to the use of Conflict Minerals in their products.

“Conflict Minerals” in this context refers to specific minerals originating from mines directly or indirectly financing or benefitting armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries, including the Republic of Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda and Zambia. Conflict Minerals include gold, tin, tantalum, and tungsten.

Vulcan Metals Corporation fully supports the U.S. Government signed Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) and is committed to responsible procurement practices to mitigate the risk of sourcing conflict minerals that can directly or indirectly finance armed groups abetting human rights violations in the DRC and adjoining countries.

As a supplier to many U.S. publicly traded companies who are required to disclose and report to the SEC the use of Conflict Minerals, Vulcan Metals Corporation holds itself to the highest ethical standards and strives to establish a supply chain that eliminates procurement of materials and/or parts using Conflict Minerals.

Vulcan Metals Corporation expects its suppliers, in turn, to agree to its Conflict Minerals Policy and to cooperate with us in efforts to support Section 1502 of the Dodd-Frank Act. Vulcan Metals Corporation undertakes due diligence in examining its supply chain and manufacturing inputs to identify any potential use of Conflict Minerals as defined in the legislation. Vulcan Metals Corporation takes a collaborative approach when engaging suppliers through the use of the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT).

If at any time Vulcan Metals Corporation is required by customer specification to use alloying materials containing any of the aforementioned minerals in its manufacturing process, Vulcan Metals Corporation will utilize the RMI CMRT to report its efforts to ensure that no Conflict Minerals were used in its supply chain.

Jeff Brentano
Executive Vice President & CFO
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