



Conflict Metals Policy

August 16, 2015

This document defines the policy regarding Conflict Metals in general, and the source of tin metal (symbol: Sn) sold by IMC-MetalsAmerica, LLC ("IMC") in particular.

Tin metal is produced in many places around the world, including in the Democratic Republic of Congo (DRC), which is considered a "Conflict Region." Therefore, tin produced in that region is deemed a "Conflict Metal." As a result, the following statements are applicable:

1. The sourcing policy of IMC precludes the purchase of Conflict Metals.
2. IMC has verified that the tin we purchase is from areas in the world that are not deemed "Conflict Regions."
3. IMC will continue to exercise due diligence to ensure the above status is maintained as long as tin is considered a Conflict Metal.