



ASSOCIATED TUBE INDUSTRIES

a division of Samuel, Son & Co.

August 20, 2013

To Whom It May Concern

Subject: Conflict Minerals

Re: Supplier Confirmation and Declaration of Compliance with the Dodd-Frank Wall Street Reform and Consumer Protection Act H.R. 4173 Section 1502.

In August 2012, the United States Securities and Exchange Commission (the 'SEC') issued final rules implementing the provisions of Section 1502 of the Dodd-Frank Wall Street Reform and the Consumer Protection Act (the 'Frank-Dodd Act'). Section 1502 of the Frank-Dodd Act imposes new reporting requirements on companies who manufacture , or contract to manufacture, products that use Conflict Minerals, which is defined as cassiterite (from which tin is derived) columbite-tantalite (coltan, the mineral from which tantalum is extracted), gold, wolframite (from which tungsten is derived), and any other minerals determined by the Secretary of State to be financing the conflict in the Democratic Republic of Congo and its adjoining countries (the DRC countries).

Since Associated Tube is a processor of metal and not a producer, we have reviewed the Conflict Minerals requirements with our suppliers. Based upon the confirmation from our suppliers, that they do not use any Conflict Minerals in their manufacturing process, our products are 'DRC' Conflict free.

Therefore as of January 1, 2013, the products we have shipped and will continue to ship to our customers are conflict free.

Sincerely,

Paul Evers
Director of Technical Development

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