



# *Imperial Metal Products Company*

## Conflict Mineral Statement

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On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) issued the final conflict minerals rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Conflict Minerals Rule), which requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum and gold or 3TG) originating in the Democratic Republic of the Congo or adjoining countries (Covered Countries).

Imperial Metal Products Company (Imperial) is not publicly traded on any U.S. or other stock exchange and thus not under obligation to report under the Conflict Minerals Rule. Nonetheless, Imperial supports the goal of ending violence, human rights violations and environmental devastation in the Covered Countries and is committed to complying with any requirements that may be applicable to Imperial under the Conflict Minerals Rule.

**Imperial will strive to work cooperatively with our customers and supply chain partners in implementing their conflict minerals compliance programs by, among others, implementing reasonable due diligence processes to understand where conflict minerals may be used, and the source and origin, within our supply chain.** Imperial will evaluate its willingness to partner with suppliers that fail to comply with this policy or support Imperial's conflict minerals compliance programs.

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