



**TULSA CENTERLESS
BAR PROCESSING, INC.**

Conflict Minerals Sourcing Policy

“Conflict minerals” originating from the Democratic Republic of the Congo (DRC) are sometimes mined and sold, “under the control of armed groups” to “finance conflict characterized by extreme levels of violence”. Some of these minerals can make their way into the supply chains of the products used around the world. In order to help end civil conflict and human rights abuses in the DRC Region committed by armed militant groups by denying revenue to those groups that derive their funding from control of mines in the DRC Region that produce conflict minerals- the SEC enacted the Dodd-Frank Act. Among other things, this law directed the U.S. Securities and Exchange Commission (“SEC”) to enact rules obligating certain publically traded manufacturing companies to annually report whether the products they manufacture or contract to manufacture contain “Conflict Minerals” that are necessary to the functionality or production of those products. The SEC published its Conflict Minerals rule in August 2012.

Tulsa Centerless Bar Processing Incorporated (TCBP) supports the objectives of the conflict minerals section of the Dodd-Frank Act. Among other things, this law directed the U.S. Securities and Exchange Commission (“SEC”) to enact rules obligating certain publically traded manufacturing companies to annually report whether the products they manufacture or contract to manufacture contain “Conflict Minerals” that are necessary to the functionality or production of those products. The SEC published its Conflict Minerals rule in August 2012. goal to work collaboratively with companies throughout our supply chain to encourage practices that support responsible sourcing of conflict free minerals.

TCBP intends to comply with the requirements of the SEC’s Conflict Minerals rule and expects our suppliers to do the same. However, TCBP does not directly purchase raw metal ores that may be used in the manufacture of our products from smelters or mines. Rather, we are sometimes several supply chain layers removed from the mining and processing of these metals and as a result, we do not have first-hand knowledge of their source.

TCBP expects our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that material supplied to us is DRC conflict free.

In support of this policy, Tulsa Centerless Bar Processing Incorporated will:

- Exercise due diligence with relevant suppliers and encourage our suppliers to do likewise with their respect supply chains.
- Provide and expect our suppliers to cooperate in providing, due diligence information to confirm any tantalum, tin, tungsten, and gold in our supply-chain are “conflict free”.
- Commit to transparency in the implementation of this policy.

We will continue to evaluate our policies to ensure compliance with the SEC’s Conflict Minerals Rule and make adjustments when necessary.

Adopted: May 2015