



Date 1/1/2019

Subject: Dodd-Frank Act of 2010, Section 1502 13(p), Securities Exchange Act of 1934, Conflict Minerals.

Thank you for your letter regarding the new "Conflict Minerals" rule finalized on August 22, 2012, by the Securities and Exchange Commission {the "SEC"} as directed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, which requires issuers of public securities to disclose their use of "conflict minerals" originating in the Democratic Republic of Congo or adjoining countries {the "DRC"}. Conflict Minerals include (tin, tantalum, tungsten, and gold).

As a global distributor of high temperature and stainless steel, commercially pure and alloyed titanium grades; United Performance Metals (UPM) promotes, through our supply chain, the traceability of these minerals to ensure compliance. UPM also firmly believes that its customers should be fully informed about the products they purchase.

UPM requires our suppliers to perform appropriate due diligence in determining compliance to the Conflict Minerals rule and to state their compliance in writing. UPM will only purchase products from suppliers that have confirmed their compliance with the Conflict Minerals rule within the Dodd-Frank Wall Street Reform and Consumer Protection Act.

United Performance Metals, as a distributor, does not make direct certification of compliance as to the country of origin of the minerals contained in the products manufactured by our suppliers. The statement of compliance to the Conflict Minerals law within the Dodd-Frank Act from the applicable manufacturer is the documentation that UPM utilizes to affirm compliance to our customers. The compliance statement letters provided to UPM by each specific manufacturer is on file and is furnished upon request.

It should be noted that the majority of the grades/alloys supplied by UPM do not contain any of the conflict minerals of tantalum, tin, tungsten and gold. It is our recommendation

that you review each grade/alloy in order to determine if any of these minerals are present as required by the intentional melt requirements of the product specifications.

Information that details the Conflict Minerals content for specific grades supplied by UPM has been compiled and is made available upon request. The compilation is periodically reviewed and updated for assessment of conflict mineral content for additional grades/alloys that are added to our offerings. Additionally, as new sources are utilized we impose upon them, the requirement to meet the Conflict Minerals requirements established by the Dodd-Frank Wall Street Reform and Consumer Protection Act.

UPM fully understands the importance of this issue to our customers and is committed to supply chain initiatives and overall social responsibility. Our efforts are designed to maintain sustainability that work towards and maintain a compliant conflict free supply chain.

Thank you for the opportunity to address your concerns regarding the SEC's Conflict Minerals Rule, and most importantly for the opportunity to be your supplier. We appreciate your business and please do not hesitate to contact Brad Butler, our Compliance Manager at <mailto:ConflictMinerals@upmet.com> with questions or comments.

Sincerely,

*Brad Butler*

Brad Butler  
Compliance Manager  
United Performance Metals