


UNITED TITANIUM, INC

**CONFLICT FREE
MINERALS
POLICY AND PROCEDURES**

Approved 04 April, 2013

Approved By:


Vice President / General Manager

United Titanium, Inc. Conflict Free Minerals Policy and Procedures

1. Policy

United Titanium, Inc. will not knowingly procure material or alloys that contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo (DRC) or an adjoining country¹. We urge our suppliers to support this policy in their own procurement guidelines and provide us with accurate country of origin information. United Titanium, Inc Corporation shall establish procedures and management systems that support this objective.

These “Conflict Minerals” are gold, wolframite, cassiterite, columbite-tantalite, and their derivative metals, which include tin, tungsten, and tantalum. See Appendix A for a list of materials as it applies to United Titanium, Inc.

2. Scope and Applicability

- 2.1 This Policy applies to all persons and entities acting for or on behalf of United Titanium, Inc. including but not limited to its employees.
- 2.2 While the Company has established procedures to ensure that it does not purchase materials or manufacture products containing Conflict Minerals from the DRC Countries, it depends upon its employees to fully comply with its procedures and to report to the Vice President / General Manager any possible concern related to the introduction of Conflict Minerals sourced from the DRC Countries into our manufacturing processes, supply chain activities, or business operations.
- 2.3 United Titanium, Inc. is a privately held company and is not required to submit an annual Conflict Minerals disclosure (Form SD) to the Securities and Exchange Commission (SEC) as required under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act).
- 2.4 Many of our customers are publicly traded companies and require information from us to meet their reporting requirements to the SEC as part of the Dodd-Frank Act. The following procedures are intended to provide guidance in gathering and reporting this information to our customers.

3. Conflict Minerals Procedures

3.1 Responsibilities

a. Compliance Manager:

- Act as Point of Contact for United Titanium, Inc. regarding customer requests for compliance information.
- Oversee the gathering and reporting of information.
- Maintain files of compliance information received from vendors and information provided to customers.
- Maintain files of United Titanium, Inc. materials containing conflict minerals and maintain files of vendors who provide those materials.
- When requests for compliance information are received, coordinate with Sales to determine what materials / alloys are sold to the requesting customer.
- Update this document on a as needed basis.

¹ The countries adjoining the DRC are those that share an internationally recognized border with the DRC. These are presently Angola, Burundi, Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

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3. Conflict Minerals Procedures (Continued)

3.1 Responsibilities (Continued)

b. Engineering Manager:

- Identify all materials (including alloys) containing conflict minerals (See Appendix A).
- If new materials are added to the United Titanium, Inc. materials list (Work Instruction WI 75-03) review new material for conflict mineral content.
- Provide above information to the Compliance Manager.

c. Purchasing Manager:

- Identify all vendors providing materials (including alloys) containing conflict minerals (includes any new vendors added to the AVL).
- Contact above vendors to determine their compliance with the Dodd-Frank Act.
- Provide information received from vendors to the Compliance Manager.

d. Vice President / General Manager:

- Make the final determination on the use of any vendor where questions or doubts exist regarding their compliance with the Dodd-Frank Act.

3.2 Compliance Statements:

a. The following statements are typical of what we want from our vendors and what our customers want from us.

- The materials supplied by Supplier do not contain or utilize tantalum, tin and tungsten, and gold (collectively, Conflict Minerals).
- The materials supplied by Supplier (including its subsidiaries) that contain or utilize any Conflict Minerals do not originate from any of the DRC Countries. Supplier has implemented procedures to identify and monitor the origin of materials (other than those from recycled or scrap sources) that are produced with Conflict Minerals.
- The materials supplied by Supplier (including its subsidiaries) that contain or utilize any Conflict Minerals are from recycled or scrap sources.

b. If a vendor provides any statements that vary greatly from what is shown above, it must be brought to the attention of the Vice President / General Manager. The Vice President / General Manager will determine if the vendor can be used as a source of material.

3.3 Requests for Information:

a. Requests from customers or other third-parties for certifications or representations as to whether United Titanium, Inc. products contain Conflict Minerals sourced from the DRC Countries will be directed to the Compliance Manager.

b. The Compliance Manager in coordination with the CFO and/or MIS Manager shall ensure compliance information is made available on the company website.

3.4 Information Updates:

a. Information from vendors will be updated on an as needed basis or when directed / requested by a customer.

b. Website information will be reviewed annually or as needed.

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Appendix A

The following UTI materials contain conflict minerals: Tantalum, tin, or tungsten (Reference United Titanium, Inc. work instruction WI 75-03, "UTI Material Identification Codes").

Mat'l ID #	Material
08	Alloy 625
10	Alloy 20
13a	Tantalum, pure
13b	Tantalum, 2 ½ W
13c	Tantalum, 90-10
14	Alloy C276
15	Alloy G3
22	Alloy C22
23	Haynes 230
30	Alloy G30
32	Alloy B3
42	Molybdenum
52	Alloy X
59	Alloy 556
68	Nitronic 50
71	Alloy 718
74	17-4 PH CRES
75	Alloy X750
86	Alloy 686

Records show there has been no United Titanium, Inc. buying activity for these materials for at least the last 5 years

45	Ti 5Al-2.5Sn
53	Columbium
33	3AL-2.5V Ti Alloy