

CONFLICT MINERAL POLICY STATEMENT

Fenix Metals Sp. z o.o. is aware of the concern of its customers following the adoption by the US Securities and Exchange Commission (SEC) of a "final rule" pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act relating to the use of conflict minerals originating from the Democratic Republic of Congo (DRC) and adjoining countries, which currently include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Fenix Metals is a member of ITA, the global tin trade association, which has led the iTSCi (ITA Tin Supply Chain Initiative), assisting upstream companies purchasing from the affected countries to develop due diligence systems conforming with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas at a practical level and clearly tracking conflict-free cassiterite from DRC to the international market.

The raw materials purchased by Fenix Metals Sp. z o.o. are all secondary materials, being either waste or processed metals created during product manufacturing. Any pure tin purchases are solely from CFS certified sources. We do not buy any tin mineral concentrates either from the DRC or any other source. As these secondary materials are from recycled and scrap sources, they can be described as 'DRC Conflict Free' according to the SEC rule. Please see page 228 of document 34-67716 (section E,4.c) dated Aug 22, 2012 at <http://www.sec.gov/rules/final.shtml>.

The metals and products made by Fenix Metals are 'DRC conflict free'.

Fenix Metals Sp. z o.o.



Michael Yde Marcussen
President

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capital PLN 28.000.000

