



phoenix tube company, inc.

Manufacturer of Stainless Ornamental and Structural Tubing

CONFIRMATION OF DRC CONFLICT FREE STATUS

Phoenix Tube Co., Inc. hereby certifies that all material supplied to:

after January 1, 2014 is: **"DRC conflict free"** as follows:

The materials supplied by Phoenix Tube as of January 1, 2014 that contain or utilize any Conflict Minerals either

- (i) do not originate from any of the Covered Countries (Democratic Republic of Congo ("DRC") and adjoining countries as identified by the "Conflict Minerals rules" adopted by the U.S. Securities and Exchange Commission (the "SEC") or
- (ii) are from recycled scrap sources.

Phoenix Tube Inc., 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.

Phoenix Tube Co., Inc.

By: _____

Name: Willem Hordijk

Title: Mgr Technical Services

Date: _____