



Phoenix Tube Company, Inc.®

CONFIRMATION OF DRC CONFLICT FREE STATUS

February 7, 2024

Re: The Dodd-Frank Wall Street Reform and Consumer Protection Act; Public Law 111-203, par.1502-Conflict Minerals; Section 13(p) Securities Exchange Act 1934 (15 U.S.C. par.78); CMRT v6.01

Phoenix Tube uses minerals that do not fall within the definition of "Conflict Minerals" as currently defined in the above cited "Dodd-Frank Act".

Phoenix Tube has investigated the type and source of raw materials supplied by NAS and its suppliers, and by this letter certifies that it uses no "Conflict Minerals" from the Democratic Republic of Congo ("DRC") or its adjoining countries whatsoever, as that term is currently defined.

Phoenix Tube understands that its certification will be relied upon for the reporting purposes described in the above captioned law, specifically found at Public Law 111-203 par.1502(b), 124 STAT. 2214 amending Section 13 of the Securities Exchange Act of 1934 at par.13(p)(1)(B).

Please note that this certification covers only the 3TG minerals specifically defined as "Conflict Minerals" within Public Law 111-203, Section 1502(e)(4)(A), 124 STAT.2218 of the above captioned law.

Regards,

Charles H. Kissinger
Engineering Manager
Phoenix Tube Company