

CONFLICT MINERAL POLICY

As a socially responsible company, Seoul Metal has concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights, comply with laws and regulations, and follow a rigorous Code of Conduct.

Seoul Metal supports the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC) and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda).

It has been widely reported that the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum and gold, now referred to as "conflict minerals", or known as "3TG". Armed groups fight for control of mines in this region and use forced labor to mine and sell the minerals, which in turn funds ongoing violence.

Seoul Metal is trying to fulfill the responsibility as a global company thinking of the future of the mankind and environment.

Thus, We has banned the use of conflict minerals (3TG: tantalum, tin, tungsten, gold) that are mined in an unethical manner in conflict regions in our business as well as from our supply chain.

Expectation for suppliers

In support of Seoul Metal's policy on conflict minerals, suppliers are expected to supply materials to Seoul Metal that are "DRC Conflict-Free".

Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. Seoul Metal expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

In the event Seoul Metal determines that a supplier's efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Seoul Metal reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Under the definition of "DRC Conflict-Free," products supplied to Seoul Metal:

1. Do not contain tantalum, tin, tungsten or gold (3TG) as elements necessary to their production or functionality, or,
2. If products supplied to Seoul Metal do contain these minerals, the minerals must originate outside the DRC, come from scrap or recycled sources, or be supplied from smelters that have been validated by an independent private sector party to be conflict-free. Certified conflict-free smelters are validated as compliant to the EICC (Electronic Industry Citizenship Coalition) conflict free smelter (CFS) protocol using the CFS Compliant Smelter List. Through the CFS protocol, smelters are audited globally; the list of compliant smelters and refiners is posted at www.conflictreesmelter.org.

Seoul Metal will conduct regular survey on direct suppliers as a part of our conflict minerals due diligence program. Suppliers are expected to respond in to survey requests in a timely manner, and with full disclosure following the specific instructions provided.



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(Signed)

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