

Subject: Conflict Minerals Compliance Statement

The United States Security and Exchange Commission recently issued its final rules requiring corporations to report the use of "Conflict Minerals" in the manufacture of their products. The current law, generally referred to as the "Conflict Minerals Law", was included as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

"Conflict Minerals" in this context refers to specific minerals originating from mines controlled by armed groups in the Democratic Republic of the Congo or adjoining countries. The specific metals in question are:

Tin (Sn)	Metallic Tin or Cassiterite
Tantalum (Ta)	Metallic Tantalum, Tantalum Pentoxide
Tungsten (W)	Metallic Tungsten or Wolframite
Columbite Tantalite	(COLTAN)
Gold (Au)	

Aubert & Duval (Company Name) is in full compliance with this legislation.
Aubert & Duval (Company Name) has conducted a country of origin inquiry of its suppliers and determined that the conflict minerals utilized by Aubert & Duval (Company Name) that are necessary to the functionality or production of AUBERT & DUVAL (Company Name)'s products do not originate from these restricted countries.

Should you have additional questions, please contact your AUBERT & DUVAL (Company Name) sales support team.

Signature



Name :

Christophe PETIT

Title :

VP QUALITY

Company Name :

AUBERT & DUVAL



Conflict Minerals Policy Statement

Aubert&Duval and Erasteel are delivering parts and metallurgical products in various metals or alloys, such as special steels, super alloys, titanium and aluminum.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act requires due diligence and disclosure requirements on companies that manufacture products containing certain minerals designated as "Conflict Minerals" – cassiterite, columbite-tantalite, gold, wolframite, and their derivatives tin, tantalum and tungsten – sourced from certain Central Africa countries – Democratic Republic of Congo or surrounding countries.

These requirements are based on concerns that revenues obtained from the commercialization of these minerals may finance the ongoing conflict in the Democratic Republic of Congo.

Although this is a US law, it impacts our companies that belong to the ERAMET Group, regardless of where our suppliers might be located.

In accordance with the ERAMET Group Code of Ethics, Aubert&Duval and Erasteel undertake to prohibit the use of « conflict minerals » for all our products, and to get organized with suppliers to meet this requirement.

To ensure compliance with these requirements, our company requires that each supplier in its supply chain provides information regarding the conflict minerals that may be contained in the products purchased by our companies and so continue to source responsibly.

Moreover, having received the commitments from our tungsten direct suppliers we certify that the Tungsten (W) used to manufacture our products do not come from the conflict area of the Democratic Republic of Congo and that we don't use Tin (Sn), Tantalum (Ta) and Gold (Au).


Denis HUGELMANN
President



An Initiative of the EICC and GeSI

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Conflict Minerals Reporting Template (CMRT)

English

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Revision 4.20
November 30, 2016

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*).

Company Information

Company Name (*):	AUBERT & DUVAL
Declaration Scope or Class (*):	A. Company
Description of Scope:	Parts and metallurgical products in aluminum, titanium, steel and super alloy Design, development and transformation of metallurgical products
Company Unique ID:	VAT FR 73 380 342 808
Company Unique ID Authority:	French Government
Address:	Tour Maine Montparnasse, 33 avenue du Maine, 75755 PARIS CEDEX 15, France
Contact Name (*):	Mr. Christophe PETIT
Email - Contact (*):	christophe.petit@eramet-aubertduval.com
Phone - Contact (*):	+33 (0)1 45 38 38 88
Authorizer (*):	Mr. Christophe PETIT
Title - Authorizer:	VP Quality
Email - Authorizer (*):	christophe.petit@eramet-aubertduval.com
Phone - Authorizer (*):	+33 (0)1 45 38 38 88
Effective Date (*):	27-Jan-2017

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is the 3TG intentionally added to your product? (*)

	Answer	Comments
Tantalum (*)	No	N/A
Tin (*)	No	N/A
Gold (*)	No	N/A
Tungsten (*)	Yes	

2) Is the 3TG necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)

	Answer	Comments
Tantalum (*)	No	N/A
Tin (*)	No	N/A
Gold (*)	No	N/A
Tungsten (*)	Yes	Supplied essentially as FeW by European Traders (Mersher GmbH, Ferromet AB and AB Ferrolegeringar)

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	No	We buy only Ferrotungstene

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	Our Suppliers recycle carbide muds and grinding scraps

5) Have you received data/information for each 3TG from all relevant suppliers? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes, 100%	Three suppliers (traders) on three

6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	All suppliers have been identified and they guarantee the origin of their FeW supply



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Conflict Minerals Reporting Template (CMRT)

English

[Click here to check required fields completion](#)

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The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*).

7) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Do you have a policy in place that addresses conflict minerals sourcing? (*)	Yes	A Conflict Mineral Policy Statement signed by our CEO A&D and ERASTEEL on the 16-Jan-2017
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	www.aubertduval.com
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	No	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Due diligence on our Supply Chain
F. Do you collect conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755 Conflict Minerals Data Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]? (*)	No	
G. Do you request smelter names from your suppliers? (*)	Yes	
H. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Documentation revue only
I. Does your review process include corrective action management? (*)	No	
J. Are you subject to the SEC Conflict Minerals rule? (*)	No	

To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red
[Click here to return to Declaration tab](#) [Click here to return to Smelter List](#)

Required fields remaining to be completed
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Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*):	AUBERT & DUVAL	Complete	
Declaration Scope or Class (*):	A. Company	Complete	
Description of Scope:	Parts and metallurgical products in aluminum, titanium, steel and super alloy Design, development and transformation of metallurgical products	Complete	
Contact Name (*):	Mr. Christophe PETIT	Complete	
Email – Contact (*):	christophe.petit@eramet-aubertduval.com	Complete	
Phone – Contact (*):	+33 (0)1 45 38 38 88	Complete	
Authorizer (*):	Mr. Christophe PETIT	Complete	
Email - Authorizer (*):	christophe.petit@eramet-aubertduval.com	Complete	
Phone - Authorizer (*):	+33 (0)1 45 38 38 88	Complete	
Effective Date (*):	27-Jan-2017	Complete	
1) Is the 3TG intentionally added to your product? (*)			
Tantalum (*)	No	Complete	
Tin (*)	No	Complete	
Gold (*)	No	Complete	
Tungsten (*)	Yes	Complete	
2) Is the 3TG necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)			
Tantalum (*)	No	Complete	
Tin (*)	No	Complete	
Gold (*)	No	Complete	
Tungsten (*)	Yes	Complete	
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	No	Complete	
4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes, 100%	Complete	
5) Have you received data/information for each 3TG from all relevant suppliers? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes, 100%	Complete	
6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	

Tungsten (*)	Yes	Complete	
7) Has all applicable smelter information received by your company been reported in this declaration? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
Question			
A. Do you have a policy in place that addresses conflict minerals sourcing? (*)	Yes	Complete	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	Yes	Complete	
The URL in the comment field	www.aubertduval.com	Complete	
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Complete	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	No	Complete	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Complete	
F. Do you collect conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755 Conflict Minerals Data Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]? (*)	No	Complete	
G. Do you request smelter names from your suppliers? (*)	Yes	Complete	
H. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Complete	
I. Does your review process include corrective action management? (*)	No	Complete	
J. Are you subject to the SEC Conflict Minerals rule? (*)	No	Complete	
Product List	0 products or item numbers listed	Complete	
Smelter List - Tantalum		Not Required	Please answer Questions 1 and 2
Smelter List - Tin		Not Required	Please answer Questions 1 and 2
Smelter List - Gold		Not Required	Please answer Questions 1 and 2
Smelter List - Tungsten		Complete	Please answer Questions 1 and 2
All rows with "Smelter not listed" selected, have a name and country listed		Complete	Please complete columns D & E