

Asia Tungsten Products Vietnam Limited

Asia Tungsten Products Vietnam Limited Conflict Minerals Policy Statement

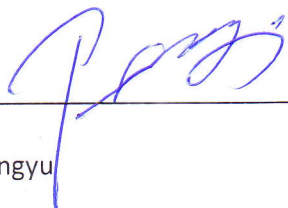
Asia Tungsten Products Vietnam Limited (“ATCVN”) condemns all activities in the raw material sector connected to illegal or unlawful exploitation of ores that directly or indirectly finances or benefits armed groups in conflict areas.

ATCVN supports the goals and objectives of Section 1502 (“Section 1502”) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Act”), which aims to prevent the use of “Conflict Minerals” that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries (as defined in the Act).

The definition of “Conflict Minerals” refers to columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals or their derivatives in the future.

ATCVN’S COMMITMENT:

1. To support the aims and objectives of the U.S. legislation and other guidelines produced by international organisations on the supply of “conflict minerals”.
2. To not procure specified metals that originate from facilities in the “Conflict Region” that are not proven as “conflict free” or in relation to which a relevant checklist has not been completed and certified by the supplier.
3. To ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains in order to ensure that specified metals are being sourced only from:
 - Mines and smelters outside the “Conflict Region” **or**
 - Mines and smelters which have been deemed as “conflict free” if sourced within the “Conflict Region” as evidenced by all supporting traceability documentation as outlined in the OECD guidelines.



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