



11040 Parker Drive
W.C.I.D.C. IV
Irwin, PA
Phone: 1-800-544-4338
Fax: 412-751-4824

July 31, 2020

RE: Conflict Minerals Policy Statement

Dear Valued Customers,

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") issued final rules implementing the Conflict Minerals Provision (Section 1502) of H.R. 4173 (the Dodd-Frank Wall Street Reform and Consumer Protection Act). The provision requires all publicly traded companies to disclose and report their use of certain minerals, which include tin, tantalum, tungsten and gold also known as ("3TG"), as well as the origin of those minerals when the use thereof is necessary to the functionality or production of the product(s) manufactured or contracted to be manufactured and demonstrate due diligence in determining if these materials originated from the Democratic Republic of the Congo ("DRC") or adjoining countries "covered countries".

For purposes of responding to Conflict Minerals inquiries such as yours, Innovative Carbide, conducted an appropriate investigation and analysis of its Tungsten Carbide Operations, manufacturing process and materials input, by knowledgeable persons involved in both aspects of its tungsten carbide operations; and, as a result of such investigation, has determined that material used by the company during the manufacturing of its products and sold to your company is conflict free.

Please feel free to contact sales@innovativecarbide.com with any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink that reads "Joel Wardropper".

Joel Wardropper
President



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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.01
 May 19, 2020

[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 (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Innovative Carbide, LLC
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	
Contact Name (*):	11040 Parker Drive, Irwin, PA 15642
Email - Contact (*):	sales@innovativecarbide.com
Phone - Contact (*):	412-751-6900 x 5
Authorizer (*):	Joel Wardropper
Title - Authorizer:	President
Email - Authorizer (*):	sales@innovativecarbide.com
Phone - Authorizer (*):	412-751-6900
Effective Date (*):	19-May-2020

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

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 (*)	Yes	We source exclusively Conflict-Free material based on OECD due diligence and Dodd-Frank Act requirements.

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	We source exclusively Conflict-Free material based on OECD due diligence and Dodd-Frank Act requirements.

5) 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 (*)	No	We source exclusively Conflict-Free material based on OECD due diligence and Dodd-Frank Act requirements.

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	100%	

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum		



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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.01
 May 19, 2020

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

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Tin		
Gold		
Tungsten (*)	Yes	



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Conflict Minerals Reporting Template (CMRT)

Revision 6.01
 May 19, 2020

[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 (*). Consult the instructions tab for guidance on how to answer each question.

8) 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. Have you established a responsible minerals sourcing policy? (*)	Yes	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	No	
C. 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? (*)	Yes	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., C	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
G. Does your review process include corrective action management? (*)	Yes	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	



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Cobalt Reporting Template (CRT)

English

Revision 2.2
 October 28, 2020
[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on cobalt.

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Innovative Carbide, LLC
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	11040 Parker Drive, Irwin, PA 15642
Contact Name (*):	Innovative Carbide - Sales
Email - Contact (*):	sales@innovativecarbide.com
Phone - Contact (*):	412-751-6900 x 5
Authorizer (*):	Joel Wardropper
Title - Authorizer:	President
Email - Authorizer (*):	joel@innovativecarbide.com
Phone - Authorizer:	412-751-6900
Effective Date (*):	29-Oct-2020

Answer the following questions 1 - 6 based on the declaration scope indicated above

Question	Answer	Comments
1) Is any of the cobalt intentionally added or used in the product(s) or in the production process? (*)	Cobalt(*) Yes	
2) Do any of the smelters in your supply chain source the cobalt from a Conflict-Affected and High-Risk area? (OECD Due Diligence Guidance, see definitions tab) (*)	Cobalt(*) DRC or adjoining countries only	One supplier's sourcing originates from the DRC, more specifically in the Congo-Zambian copper belt. For the DRC this means the Southern province of Katanga. This area is very distant of the
3) Does 100 percent of the cobalt originate from recycled or scrap sources? (*)	Cobalt(*) No	
4) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Cobalt(*) 100%	
5) Have you identified all of the smelters supplying the cobalt to your supply chain? (*)	Cobalt(*) Yes	
6) Has all applicable smelter information received by your company been reported in this declaration? (*)	Cobalt(*) Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a publicly available cobalt sourcing policy? (*)	No	The policy is not publicly available on our website
B. Does your policy cover, at a minimum, all risks in the OECD Due Diligence Guidance Annex II Model Policy, as well as the worst forms of child labor? (*)	Yes	
C. Have you implemented due diligence measures for cobalt in the declaration scope indicated above? (*)	Yes	
D. Do you require suppliers to exercise due diligence over the cobalt supply chain in accordance with the OECD Due Diligence Guidance? (*)	Yes	
E. Do you require your direct suppliers to source cobalt from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
F. Do you require suppliers' due diligence practices to cover, at a minimum, all risks in the OECD Due Diligence Guidance Annex II Model Policy, as well as the worst forms of child labor? (*)	Yes	
G. Does your company conduct cobalt supply chain survey(s) of your relevant supplier(s)? (*)	Yes, CRT	
H. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
I. Does your review process include corrective action management? (*)	Yes	