Conflict Minerals - January 2020

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To Whom This May Concern:

As a result of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Conflict Minerals rules adopted by the U.S. Securities and Exchange Commission (the "SEC"), many companies, including certain of our customers, are required to make disclosures regarding whether "conflict minerals" used to manufacture their products originated in the Democratic Republic of Congo ("DRC") or the adjoining countries (collectively, together with the DRC, the "Covered Countries"). These "conflict minerals" consist of columbite-tantalite, cassiterite, gold, wolframite, or their derivatives, which are initially limited to tantalum, tin, and tungsten (collectively, the "Conflict Minerals").

We hereby certify that all pipe and tube we supply to our customers from and after January 1, 2013 are "DRC conflict free" as follows:

The pipe and the tube supplied by Nova Tube Inc, Nova Tube Baie-D'Urfe and Delta Tube do not contain or utilize tantalum, tin, tungsten and gold (collectively, the "Conflict Minerals");

The material supplied to produce the pipe and the tube do not originate from the Covered Countries, which includes Democratic Republic of Congo ("DRC") and the "adjoining countries", which presently includes Angola; Burundi; Central African Republic; the Republic of the Congo; Rwanda; South Sudan; Tanzania; Uganda and Zambia.

Martin Bolduc, B. Eng
Quality Manager, Pipe and Q/A

06/30/2020

Date