

HEYCO METALS, INC.

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HEYCO METALS POLICY REGARDING CONFLICT MINERALS

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (2010) implements disclosure requirements for companies which purchase or use conflict minerals. At this time, Conflict Minerals have been interpreted to mean:

Columbium-tantalite

Casserite

Gold

Wolframite

or their derivatives, as originating from The Democratic Republic of Congo and adjoining countries.

The Secretary of State may determine that this interpretation be extended to include other minerals, or their derivatives.

The final SEC rule pertains to minerals mined to produce the following:

Tin

Tantalum

Tungsten

Gold

Heyco Metals does not smelt minerals or melt metals or alloys. All our raw materials are purchased in semi-finished form from major domestic and European metal mills. The only material listed above which is contained in the materials we buy is tin. A small proportion of our product is tinned at domestic plating houses.

In order to fulfill our responsibilities under the Dodd-Frank Act, we have requested of our suppliers that they confirm the absence of Conflict Minerals in the product we buy from them. We maintain these certifications on file. A list of those vendors can be provided upon request.

David Mandle

Executive Vice President

David Keny March

Heyco Metals Inc.