



November 1, 2020

Heyco Metals Conflict Minerals Policy Statement

Heyco Metals, Inc, remains committed to the responsible sourcing of materials through our global supply chain.

On August 22, 2012, the U.S. Securities and Exchange Commission issued final rules implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act (the "Act"). In accordance with the Act, reporting companies must determine whether any conflict minerals originating in the Democratic Republic of the Congo or certain adjoining countries (defined by the Act as Tin (Cassiterite), Tungsten (Wolframite), Tantalum (Columbite-Tantalite or Coltan) and Gold (the "Conflict Minerals")) are necessary to the functionality or production of their manufactured products.

Heyco Metals has established a program to review our global supply chain for materials that contain Conflict Minerals. This program includes Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas of the Organization of Economic Cooperation and Development.

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

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

A handwritten signature in black ink, appearing to read "W.P. Barry", with a horizontal line extending to the right.

William P. Barry
VP Sales & Marketing
Heyco Metals, Inc.