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A LYNN TILTON PATRIARCH PARTNERS COMPANY

## **Conflict Minerals Policy Statement**

LIBERTAS COPPER LLC is committed to compliance with the U.S. Securities and Exchange Commission's ("SEC") final rules relating to the implementation of reporting and disclosure requirements with respect to "conflict minerals" (defined below). These rules were mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. (Reference: <http://www.sec.gov/News/PressRelease/Detail/PressRelease/1365171484002.>)

These rules require manufacturers that file certain reports with the SEC to disclose in a new "Form SD" filing whether the products they manufacture or contract to manufacture contain conflict minerals that are "necessary to the functionality or production" of their products – and, if so, whether these materials can be declared "conflict free." LIBERTAS COPPER LLC expects its suppliers to support its compliance commitment by exercising appropriate due diligence on the source and chain of custody of regulated minerals and by making their due diligence measures and results available to LIBERTAS COPPER LLC upon request.

The SEC's final rules define the term "conflict mineral" . . . as

- columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or
- any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country."

It is LIBERTAS COPPER LLC's intention to bring industry best-practices to bear in working with our global supply chain partners to:

- Support the policies underlying the U.S. legislation relating to the supply of conflict minerals
- Conduct reasonable, risk-based due diligence of our supply chain (and require our suppliers to do the same) using industry accepted templates and other recognized reporting tools
- Develop and implement methodologies for periodically validating smelter and mine adherence to industry norms in conflict minerals compliance
- Upon identification of any sources of supply of conflict minerals that are deemed to be "non-conflict free," to institute remedial action up to and including alternative sourcing from "conflict free" resources.