



ESP Specialty Steel Products

**Energy Steel Products, LLC**

7404 Railhead Ln  
Houston, TX 77086  
[www.espsteel.com](http://www.espsteel.com)

Date: April 23, 2019

Dear Valued Customer,

We share your interest in compliance with the “Conflict Minerals” rule recently finalized on August 22<sup>nd</sup>, 2012 by the Securities Exchange Commission (SEC) in compliance with Section 1502 of the Dodd-Frank Act of 2010.

This new rule requires publically traded companies to report on their use of “Conflict Minerals” which in turn imposes requirements on suppliers downstream in the supply chain to track and report on “Conflict Minerals” content. We understand the definition of “Conflict Minerals” to include columbite-tantalite (coltan, niobium, and tantalum), cassiterite (tin), gold and wolframite (tungsten) and their derivatives that are directly sourced from the Democratic Republic of Congo (DRC) and its neighboring countries of: Angola, Burundi, Central African Republic, Congo Republic (a different nation than DRC), Rwanda, Sudan, Tanzania, Uganda, and Zambia.

We further understand that the SEC has ruled that it is impossible to trace the origin of Conflict Minerals in recycled scrap and therefore requires only a “reasonable inquiry” as to whether Conflict Materials are present in scrap material. As a result, the primary focus of due diligence is on direct purchases of Conflict Material for deliberate inclusion in manufactured products.

Since ESP Specialty Steel Products is a distributor and not a manufacturer of the products we sell, we initiated a process to ensure that our mill suppliers are providing us with products that can be categorized as “DRC Conflict Minerals Free” and have collected statements from each of our mill suppliers confirming this status. We can make these statements available to you at your request.

As of the date of this letter, we do NOT anticipate that our products for sale will be found to contain any “Conflict Minerals” as defined above but as our due diligence progresses we will be sure to promptly notify you of any findings to the contrary.

If you have further questions or concerns, feel free to contact me directly.

Sincerely,

**ENERGY STEEL PRODUCTS LLC**

Marcus Brod  
CFO / Senior Executive Vice President  
Direct (281) 760-0412

---

Houston  
7404 Railhead Ln  
Houston, TX 77086  
(281) 760-0400

[www.espsteel.com](http://www.espsteel.com)  
Toll Free: (888) 377-4317

Chicago  
1191 W. Hawthorne Lane  
West Chicago, IL 60185  
(630) 876-5950