

October 28, 2010



COMPANY POLICY REGARDING CONFLICT MINERALS

In accordance with the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 ("Conflict Minerals Act"), Carter Alloys Company performs, on an ongoing basis, due diligence on our supply chain regarding the source of "conflict minerals" defined in the Conflict Minerals Act to ensure such conflict minerals are "DRC conflict free".

"DRC conflict free" is defined in the Conflict Minerals Act as conflict minerals that do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or an adjoining country.

Carter Alloys requires its suppliers to provide written documentation to confirm the country of origin of all mined materials. We accept only those materials that are supplier-certified as originating from countries other than the DRC and adjoining countries. Materials produced from conflict minerals defined in the Conflict Minerals Act are uniformly rejected by Carter Alloys.

In addition to formal documentation requirements, Carter Alloys also relies on longstanding supplier relationships and deep knowledge and understanding of our suppliers' operations and mineral sourcing protocols. We maintain a strong base of information on the origination and sourcing of all materials offered to our customers.

STEVEN CARTER

PRESIDENT

CARTER ALLOYS COMPANY