

Circular of 11.2.2014

Dodd-Frank Act

Under the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 („Dodd-Frank Act“), Section 1502, certain US companies have specific reporting obligations towards the Securities and Exchange Commission. Hence, companies now have to report on a yearly basis, whether their products contain Conflict Minerals (currently covered thereunder: columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives) that originate in the Democratic Republic of Congo or adjoining countries as specified by the Dodd-Frank Act. As a result of that, companies of the Special Steel Division are regularly requested by their customers to confirm their compliance with the provisions of the Dodd-Frank Act, in particular that the Conflict Minerals contained in their products do not originate from the regions mentioned above.

In order to ensure compliance with the provisions of the Dodd-Frank Act in the Special Steel Division, the management board of voestalpine Edelstahl GmbH has resolved that

companies of the Special Steel Division shall only purchase raw materials and other products containing Conflict Minerals from suppliers that confirm towards the procuring company of the Special Steel Division by means of a completed reporting template of the Electronic Industry Citizenship Coalition, Incorporated (see: <http://www.eicc.info/>) that the Conflict Minerals contained in the purchased raw materials or products do not originate from the Democratic Republic of Congo or adjoining countries and respective measures have been taken to assure this.

This resolution shall be binding on all companies of the Special Steel Division. The Special Steel Division includes all companies in which voestalpine Edelstahl GmbH has a direct or indirect interest of at least 50% or that are under its control in some other way.

In case the above conditions are fully met, companies of the Special Steel Division shall use the following statements to incorporate in their replies towards their customers to confirm compliance with the provisions of the Dodd-Frank Act:

A. Conflict Minerals are contained in the products: Having received the commitments from all our [raw material] suppliers we certify that Tungsten (W) [used to manufacture / contained in] our products does not come from the Democratic Republic of Congo or an adjoining country.

B. No Conflict Minerals are contained in the products: Per your request, we have reviewed [CUSTOMER NAME]’s historical purchases from [voestalpine company] and the grades which you have purchased in the past 12 months [i.e add grades from Conflict Mineral free approved material list here] are not alloyed with Conflict Minerals [production companies may add: nor are any Conflict Minerals utilized in the production process for the purchased items].

In case of any questions, please contact Mr David Kraß (david.krass@voestalpine.com) employee in the Legal & Compliance department of voestalpine Edelstahl GmbH.

The Management Board
of voestalpine Edelstahl GmbH