

General Policy Statement on Conflict Minerals

Irwin Industrial Agencies Ltd understands the intent of the rules and laws surrounding the use of conflict minerals in connection with Section 1502 of the Dodd-Frank Wall Street Reform & Consumer Protection Act. Irwin Industrial supports the efforts to promote ethical sourcing of minerals and to end human rights violations in the Democratic Republic of Congo (DRC) and adjoining countries.

Conflict minerals, as defined by US legislation, are 3TG which include tantalum, tin, tungsten and gold. These substances are derived from cassiterite, columbite-tantalite and wolframite respectively. The disclosure of the use of conflict minerals is necessary for any public trading companies that are registered with SEC.

As a distributor based in Canada, Irwin Industrial does not manufacture or contract to manufacture products containing 3TG, nor do we directly purchase minerals from any source.

Irwin Industrial supports its suppliers in creating a transparent supply chain with concern to conflict minerals. Tracking conflict minerals usage over hundreds of suppliers is challenging, but as more manufactures report on their supply chain practices, Irwin Industrial intends to make this information available to our customers.

Irwin Industrial sets the expectation that its suppliers will maintain a DRC conflict free supply chain in compliance and support of the conflict minerals legislation. We continue to have open communications with all of our suppliers that use conflict minerals in their products and we conduct due diligence audits to the best of our capabilities.

Sincerely,



Michelle Irwin, Purchasing Manager, mirwin@irwin-ind.com