



TMK-ARTROM S.A.

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Subscribed and Paid Share Capital: 291.587.538,34 lei

Conflict Mineral Policy,

TMK-ARTROM S.A., seamless steel tubes producer, is concerned about the use of natural resources to fund the armed conflict in the Democratic Republic of the Congo. While we believe it is unlikely any Conflict Materials or their derivatives are used in TMK-ARTROM S.A. products, it is our policy to avoid the use of materials from such sources "Conflict Minerals" refers to minerals or other derivatives (specifically, Tin, Tantalum, Tungsten, and Gold) mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses.

The Dodd-Frank Wall Street Reform and Consumer Protection Act, signed by President Obama on July 21, 2010, are new requirements for manufacturers of products containing tin, tantalum, gold, tungsten, or any other "conflict metals". Specifically, section 1502, of the new law imposes direct reporting requirements on any publically traded companies whose products contain metals derived from conflict materials. Conflict Minerals are mined in or near areas such as the Democratic Republic of Congo (DRC), which benefit armed groups committing violence in the DRC.

TMK-ARTROM S.A. fully supports this legislation and its position to avoid the use of conflict minerals mined from the DRC and adjoining countries. Furthermore, TMK-ARTROM S.A. requires all suppliers to undertake reasonable due diligence within their supply chain to ensure that the minerals are not being sourced from mines in conflict areas. Suppliers must pass this requirement through the supply chain and determine the source of specified minerals. Suppliers who are non-compliant to these requirements shall be reviewed by our purchasing managers for future business.

This conflict minerals policy is in line with the Global Business Initiatives on Human Rights and the framework of the United Nations Principles of Human Rights encouraging governments and businesses to respect, protect, and remedy human rights.

TMK-ARTROM S.A. will continue to work with our suppliers to help them understand the issues around Conflict Minerals and to ensure the origin of the metals in components and materials are derived from Conflict Free Minerals.

Director of Quality, Environmental and Integrated Management System

Magdalena Popescu

April 28, 2015

ISO 9001
ISO 14001
OHSAS 18001

AD-2000 WO/W4
TRD 100/102
Vd TUV

LRS
DNV
GL-RULES

5CT-0440
5L-0352

PED 97/23/EC
EN 10297

EN 10210-1,2
EN 10255

DIN 1629
EN 10210

ISO/TS 16949

TMK EUROPEAN DIVISION Cod: FCU-01, Ed.3 Rev. 1/2014