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PRODUCT SPECIFICATION BULLETIN CONFLICT FREE MATERIALS

In August 2012, the Securities and Exchange Commission (the "SEC") adopted final rules implementing §1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

These rules impose disclosure and due diligence requirements on publicly-traded companies that manufacture products containing minerals designated as "conflict minerals¹" that originate in the Democratic Republic of Congo ("DRC") or adjoining African countries including Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Although these rules do not apply to The Phoenix Forge Group, the material test reports we receive from steel suppliers used to make our finished products do not contain any reported cassiterite, columbite, tantalite, gold, wolframite, tantalum, and tungsten, and is not melted in any of the DRC or other adjoining conflict countries.

On some material test reports we receive from steel suppliers, the residual element of tin is reported in trace amounts. However, the country of origin of tin is not reported on these material test reports since the raw material steel is melted from re-cycled scrap but none of our raw materials are melted in the Democratic Republic of Congo or adjoining countries including Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

The Phoenix Forge Group is not a publically traded company and thus privately owned. Therefore, these rules do not apply to the products manufactured by The Phoenix Forge Group and we hereby certify full conformance to the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2012.

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