



Conflict Minerals Policy Statement

In accordance with the SEC requirements of the Frank-Dodd Act legislation Section 1502 (2012) for Conflict Minerals Reporting-Penn Union Corp. requires supplier verification those companies do not purchase or use defined conflict minerals(tin, tungsten, tantalum and gold) originating from the DRC (Democratic Republic of the Congo) or adjoining countries.

Penn-Union requires suppliers to provide this written verification through the use of the EICC/Cfsi Conflict Minerals Reporting Template. In this document the country of origin of mined materials listed above is documented for verification of being "DRC Conflict Free".

Penn-Union Corp. as a privately held corporation is not subject to the Conflict Minerals rules and reporting requirements but realizes our many customers may be and thus we are committed to helping them comply with their reporting requirements.

Penn-Union Corp.