

### Conflict Minerals Divisional Certification Form

Reporting Date:	5/20/2019	Reporting Period:	1/1/18 – 12/31/18
Reporting Division:	Vulcan Threaded Products		
Location:	Pelham, AL		
Contact Name:	Alan Logan	Contact Phone:	205-620-5103
Contact Title:	Customer Service Manager	Contact Email:	Alan.logan@vulc.com

Conflict Minerals (as that term is defined under the final rules of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) include **cassiterite, columbite-tantalite, wolframite, and gold**, and their derivatives, which are limited to **tin, tungsten, tantalum and gold**.

The reporting Division has undertaken a review of its potential use of Conflict Minerals, including an appropriate rationalized supply chain review. Based on the review of appropriate personnel at this Division, as indicated by signature below, and whom I (we) have determined to have the requisite knowledge and expertise to provide informed responses to the following statements and conclusions, I (we) have determined that:

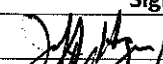
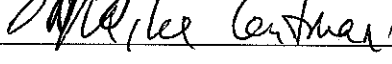
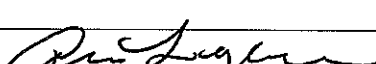
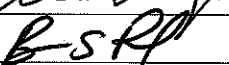

1.  Conflict Minerals **are not** necessary to the functionality or production of product(s) manufactured or contracted to be manufactured by this Division.
2.  Conflict Minerals **are or may be** necessary to the functionality or production of product(s) manufactured or contracted to be manufactured by this location, as further identified below.
3.  Conflict Minerals in the form of recycled or scrap material **are or may be** necessary to the functionality or production of product(s) manufactured or contracted to be manufactured by this location, as further identified below.

#### Conflict Minerals Usage Summary

(Note - complete this section only if Box No.2 above has been checked)

Conflict Mineral or Derivative	SDI Product(s) Used In	Conflict Mineral Supplier(s)	Conflict Free? (Y/N)

The undersigned hereby certifies that the information set forth herein is correct as of the date of signature and that the determinations herein made were arrived at after reasonable and informed inquiry and investigation.

Reviewers			
Printed Name	Signature	Function	Date
Jeff Hayes		Purchasing	5/20/2019
Mike Gutman		Metallurgist	5/20/2019
		Engineering	
Alan Logan		Quality	5/20/2019
Brian Parrish		Production Manager	5/20/2019
Approver			
Printed Name	Signature	Title	Date
Dennis Black		VP and General Manger	5/20/2019