



CONFLICT MINERALS POLICY

The United States Congress enacted the Conflict Minerals Rule within the Dodd-Frank Wall Street Reform and Consumer Protection Act in 2010, requiring disclosures about the use of specified conflict minerals originating from the Democratic Republic of the Congo (DRC) and nine adjoining countries (the Covered Countries). Armed groups engaged in mining operations in this region are believed to subject workers and indigenous people to serious human rights abuses, and are using proceeds from the sale of conflict minerals to finance regional conflicts. WireCo WorldGroup Inc. (the Company) supports the humanitarian goal of ending the violence and human rights violations in the Covered Countries, strives to have a conflict-free supply chain, and is committed to working with its suppliers to increase transparency regarding the origin of minerals contained in its products.

Conflict minerals are defined as cassiterite, columbite-tantalite (colton), gold and wolframite, as well as their derivatives, which are presently limited to tin, tantalum, and tungsten, that are financing armed conflict in one of the Covered Countries. These are sometimes referred to as 3TG (tin, tungsten, tantalum and gold).

The rule requires all public companies who file reports with the Securities and Exchange Commission (SEC) and who manufacture or contract to manufacture products for sale to third parties to determine if conflict minerals are necessary to the functionality or production of the product and if so, trace the minerals back to their source and report the results to the SEC. The Company is committed to complying with the conflict minerals requirements under the Act and the rules and regulations issued by the SEC.

The Company has conducted an analysis of all products the Company manufactures or contracts to manufacture and its supply chain, and has determined that to the extent any of these minerals appear in the Company's products, they do not originate from a Covered Country. To ensure the Company's products remain free of conflict minerals, the Company will perform regular reviews on all products and processes involved in manufacturing. The Company's Supplier Code of Conduct, which is applicable to all of the Company's suppliers, includes similar requirements relating to conflict minerals.