CONFLICT MINERALS COMPLIANCE

To: Our Valued Customer
Re: Conflict Mineral Compliance

This letter will confirm that seamless copper tube supplied by Great Lakes Copper Ltd. complies with the 2010 United States legislation, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, as well as Section 13(p) to the Securities Exchange Act of 1934, relating to the use of Conflict Minerals.

"Covered Countries" is defined as the Democratic Republic of Congo (the "DRC") and any country that shares an internationally recognized border with the DRC, which presently includes Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. "Conflict Minerals" identified as gold, tantalum, tin, and tungsten.

All Great Lakes Copper Ltd. copper tube products, are manufactured from UNS Alloy C12200. The copper content is 99.9% with residual phosphorous from .015 to .040%. All the products manufactured at Great Lakes Copper Ltd., in London Ontario, Canada do not contain or utilize any Conflict Minerals.

If you have questions or concerns regarding our manufactured products please contact GLC.

March 20, 2018