GREAT LAKES COPPER LTD.

March 20, 2018

Subject: DFAR Compliance

All copper tube products supplied by Great Lakes Copper Ltd. are manufactured from UNS Alloy C12200 (Phosphorus Deoxidized, High Residual Phosphorus Copper). The chemical composition of this alloy is: **Copper 99.9%, Phosphorus 0.015 – 0.040%.**

All of our suppliers for raw and recycled metals are located within countries listed in the Defense Federal Acquisition Regulation Supplement qualifying countries lists. Great Lakes Copper Ltd. has no set regulatory controls as to where our suppliers source their metals from. Great Lakes Copper Ltd. does not require our suppliers to disclose where they obtain their metals which they sell to us.

I trust that the foregoing meets with your approval. Should you have any questions or concerns, please do not hesitate to call us.

Phone # 519-455-0770