

STATEMENT ON CONFLICT FREE MINERALS – COMETAL S.A.

Cometal is concerned that the trade of conflict minerals mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and surrounding countries (Republic of the Congo, Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Zambia, Angola, and Tanzania) may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. Conflict minerals and their refined metals – tantalum, tin, tungsten and gold – regardless of where they are sourced, processed or sold, are widely used in the markets served by Cometal.

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) approved the final rule regarding the sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Although the Act does not apply directly to Cometal, it may have implications for our customers and through Cometal's alignment with the existing legislation throughout our supply chain it is supporting its customers to comply with this rule. As a result, we support the actions of governments and organizations to increase supply chain transparency and enable companies to source conflict-free minerals.

Cometal strives to work closer with its raw material sources buying the minerals directly from the mines by means of joint ventures and collaboration agreements with local miners and producers outside of conflict areas, thereby ensuring a closer monitoring and control of produced mineral and the export thereof to final destination (traceability from mine to market within Cometal's supply chain custody).

Cometal has therefore implemented a process to increase its supply chain due diligence measures and internal controls for the covered minerals.

Cometal is committed to responsible sourcing materials from companies that share our values around human rights, ethics and environmental responsibility as well as comply with our Code of Conduct.

Based on the information provided by our suppliers and business partners to date, we are not aware of any conflict minerals sourced from the DRC or adjoining countries in our supply chain.

Madrid, March 2013
Uwe Geppert, Managing Director