



November 29, 2012

**Conflict Minerals Policy Statement:**

The tin that Titan International, Inc. uses for manufacturing, alloying or distribution purposes is produced from one of the following conflict-free smelters. These smelters are not located in area of conflict, nor do they source tin concentrate from conflict regions. We are committed to environmental and social responsibility throughout our business, and abide by the guidelines set forth in the Dodd Frank Act and by the EICC.

EM Vinto, Bolivia, Smelter ID 2BOL010  
PT Timah, Indonesia, Smelter ID 2IDN042  
PT Koba Tin, Indonesia, Smelter ID, 2IDN036  
CV United Smelting, Indonesia, Smelter ID 2IDN009  
Malaysia Smelting Corp, Malaysia, Smelter ID 2MYS016  
Mineracao Taboca S.A., Brazil, Smelter ID 2BRA018  
Minsur, Peru, Smelter ID 2PER019  
OMSA, Bolivia, Smelter ID 2BOL022  
Thaisarco, Thailand, 2THA046  
Yunnan Tin Company Limited, China, Smelter ID2CHN048  
CopperSanta, Brazil, Smelter ID NA

If you have any questions regarding this policy, please contact our office at 856-735-2220.

Best regards,

A handwritten signature in black ink, appearing to read "William D. Glycenfer". The signature is fluid and cursive.

William Glycenfer, Vice President



**GILBERT & JONES**  
COMPANY, INC.

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***Metal Supplier Social & Environmental Responsibility Declaration***

Gilbert & Jones confirms that it is following the Electronic Industry Code of Conduct (EICC, <http://www.eicc.info/code.html>), or equivalent labour, human rights, health, safety and environmental standards.

In the table below, indicates the metal and the country of origin

<b>Metal</b> (tin, cobalt, copper, gold, palladium, aluminum, or ytterbium and europium (also known as "rare earth elements" or lanthanide elements))	<b>Country</b> where the metal is mined (or recycled)
Copper	United States
Copper	Canada
Tin	Peru
Tin	China
Tin	Indonesia
Nickel	Canada
Nickel	Russia

We do not purchase the above metals from the Democratic Republic of Congo (DRC). We have also been assured to by the manufacturers we use they do no purchase from the DRC.

Signature \_\_\_\_\_

Name George M Gilbert

Title President

Date 11/01/12