

4-3-14

## Copper & Brass Sales U.S. International Traffic in Arms Regulations (ITAR) Compliance Statement

Dear Valued Customer:

It is Copper and Brass Sales' commitment to ensure that we are in compliance with all U.S. Government export compliance laws and regulations, specifically 22 C.F.R. Chapter 1, Subchapter M Parts 120-130 (the International Traffic in Arms Regulations, which include ITAR Part 122 – Registration of Manufacturers and Exporters.)

ITAR Part 122.1(a) states:

“Any person who engages in the United States in the business of either manufacturing or exporting defense articles or furnishing defense services is required to register with the Directorate of Defense Trade Controls (D.D.T.C.). For the purposes of this subchapter, engaging in the business of manufacturing or exporting defense articles or furnishing defense services requires only one occasion of manufacturing or exporting a defense article or furnishing a defense services. Manufacturers who do not engage in exporting must nevertheless register.”

Based on the above definition, since Copper and Brass Sales may receive ITAR controlled documents, prints or technical data, we are in the process of getting registered with the D.D.T.C.. Our registration should be completed by 12-31-14.

Please feel free to contact us with any questions regarding this matter.

For more information on ITAR regulations, please visit the following website: U.S. State Department - Policy - Directorate of Defense Trade Controls - <http://www.pmdetc.state.gov/>

Sincerely,



Charles J. Biegel  
ITAR Compliance Mgr.  
ThyssenKrupp Materials NA, Inc.  
Copper and Brass Sales Division