

DISCLOSURES UNDER THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

At Bohler Uddeholm, we are committed to delivering the highest quality products and base our business on ethical practices which are built on a foundation of trust with our partners, customers and employees. Integrity, customer and employee satisfaction, commitment to excellence, taking responsibility for environmental sustainability, and providing a safe workplace are the hallmarks of the Company. Under the Company's Code of Conduct, Employees and Business Partners expected to adhere to guidelines for appropriate personal conduct and business ethics in a culture of respect, fairness, and continuous improvement.

The California Transparency in Supply Chains Act of 2010 ("the Act") requires Bohler-Uddeholm to disclose the information below regarding its efforts to monitor human trafficking and the use of slave labor in its supply chains.

- 1. Verification of Supply Chain.** Bohler-Uddeholm does not currently verify its product supply chains to evaluate and address the risks of human trafficking and slavery.
- 2. Audits.** Bohler-Uddeholm has not conducted any audits of its suppliers to evaluate compliance with Bohler-Uddeholm's expectation that no slave labor or labor resulting from human trafficking is used in its supply chains.
- 3. Supplier Certification.** Bohler-Uddeholm does not currently require its direct suppliers to certify that materials incorporated into its products comply with the laws regarding slavery and human trafficking.
- 4. Accountability.** Through its Code of Conduct, Bohler-Uddeholm maintains internal accountability standards and procedures regarding Employee and Business Partner compliance with applicable laws and high ethical standards, which includes any laws regarding slavery and human trafficking.
- 5. Employee Training.** Bohler-Uddeholm does not currently provide training regarding slavery and human trafficking to its employees responsible for supply chain management.

Although there are no formal processes in place to ensure we carry out the steps outlined in the California Transparency in Supply Chains Act of 2010, Bohler-Uddeholm purchases their materials from affiliated companies that we believe are ethical, reputable and well-established and subject to Bohler-Uddeholm's Code of Conduct. The Company has every level of confidence that its materials are produced to high standards of quality and safety throughout our supply chain by individuals who are well-treated and compensated fairly by their employers for their work in accordance with all applicable governmental laws.