



CREATIVE PATHWAYS INCORPORATED

FABRICATION OF COMPLEX TUBULAR SYSTEMS

January 22, 2018

Notice to all Creative Pathways Suppliers:

Re: Release of revised Supplier Quality Clauses F-840-006-B; new Quality Code 36 on Conflict Minerals – 3TG: Section 1502 of the Dodd-Frank Wall Street Reform Act

Dear Sir / Madame:

Creative Pathways, Inc. is a “DRC Conflict Free” supplier, and expects and requires all of its direct suppliers to be the same. DRC stands for the Democratic Republic of the Congo and its surrounding countries, and conflict minerals or “3TG” are “Gold, Tin, Tantalum, and Tungsten”, the derivatives of cassiterite, columbite-tantalite, and wolframite. The intent of this requirement is to further the humanitarian goal of ending violent conflict in the DRC, which has been partially financed by the exploitation and trade of conflict minerals.

An amendment to U.S. federal legislation, under Section 1502 of the Dodd-Frank Wall Street Reform Act, affects manufacturers who file certain reports with the Securities and Exchange commission (SEC), and requires these manufacturers to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are necessary to the functionality or production of those products.

Based on this legislation and the due diligence required by all involved in the supply chain, Creative Pathways institutes the following policy on conflict minerals; effective immediately on all purchase orders as and where invoked:

Quality Code 36 “Conflict Minerals 3TG: Sect. 1502 Dodd-Frank Wall Street Reform Act” states: “No Conflict Minerals (Gold, Tin, Tantalum, or Tungsten) shall be used, contained in or introduced to the raw materials, products or processes supplied. If such minerals are present in the products, processes, or materials to be supplied, the supplier must notify Creative Pathways immediately and prior to processing this order”. Note: Supplier Quality Clauses “F-840-006-B” replaces and supersedes the previous / original version (F-840-006-A) and strictly adds this quality code.

Should you have any questions, concerns, or knowledge of any conflict minerals present in the products, processes or materials provided to Creative Pathways, please contact the undersigned or the purchasing agent identified on the purchase order at your earliest possible convenience.

Thank you!

Respectfully yours,

John Wiemken
Quality Manager
Creative Pathways