



CONFLICT MINERALS POLICY

Big River Steel LLC (Big River) deplores the violence in the Democratic Republic of the Congo and adjoining countries and is committed to supporting responsible sourcing of conflict minerals from the region. The conflict minerals are tin, tungsten, tantalum and gold.

Although not a publicly traded company, Big River intends to comply with the requirements of the Dodd-Frank Financial Reform Law and the Security and Exchange Commission's Conflict Minerals rule and expects our suppliers to do the same. However, Big River does not directly purchase raw metal ores that may be used in the manufacture of our products for smelters or mines. Rather, we are several supply chain layers removed from the mining and processing of these metals, and as a result, we do not have first-hand knowledge of their source.

Big River is committed to sourcing materials from companies that share our values around human rights, ethics, and environmental responsibility. We support industry efforts such as Electronic Industry Citizenship Coalition and Global- sustainability initiatives to enable companies to source conflict-free minerals.

Please find attached Conflict Minerals Reporting Template in page two and three of this letter.

Sincerely,

Denis Hennessy

Director of Product Development

dhennessey@bigriversteel.com

Company Information

Company Name (*):	Big River Steel LLC	
Declaration Scope or Class (*):	A. Company	
Description of Scope:	Big River Steel (BRS), Osceola, AR - Big River Steel expects all of its suppliers source materials from socially responsible suppliers. BRS expects its suppliers to comply with the Dodd-Frank legislations and provide declarations.	
Company Unique ID:		
Company Unique ID Authority:		
Address:		
Contact Name (*):	Gary Boss	
Email - Contact (*):	gboss@bigriversteel.com	
Phone - Contact (*):	870-955-2168	
Authorizer (*):	Denis Hennessy	
Title - Authorizer:	Director of Product Development	
Email - Authorizer (*):	dhennessy@bigriversteel.com	
Phone - Authorizer:	870-955-3031	
Effective Date (*):	31-May-2021	

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)

	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten	No	

2) Does any 3TG remain in the product(s)?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

6) What percentage of relevant suppliers have provided a response to your supply chain survey?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

7) Have you identified all of the smelters supplying the 3TG to your supply chain?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

8) Has all applicable smelter information received by your company been reported in this declaration?

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy?	Yes	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.)	Yes	https://bigriversteel.com/about/quality
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?	No	
D. Have you implemented due diligence measures for responsible sourcing?	Yes	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?	Yes, in conformance with IPC1755 (e.g	
F. Do you review due diligence information received from your suppliers against your company's expectations?	Yes	
G. Does your review process include corrective action management?	Yes	
H. Is your company required to file an annual conflict minerals disclosure?	Yes, with the SEC	

© 2021 Responsible Minerals Initiative. All rights reserved.