



Conflict Minerals Rule

Grouper Acquisition Company LLC dba Shiloh Industries LLC (“Shiloh”) and its subsidiaries are committed to maintaining the protection of international human rights within our scope of influence. Shiloh is cognizant of the ongoing issue of minerals originating from the Democratic Republic of the Congo (DRC) or one of the nine surrounding countries (together, the “Covered Countries”). Shiloh supports efforts to eliminate the use of minerals originating in the DRC and therefore our goal is to source materials from companies that share its values concerning human rights and social responsibility.

On August 22, 2012, the Securities and Exchange Commission (SEC) issued the final rules to implement Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”). The rules impose reporting requirements on certain companies to perform due diligence with respect to the sourcing of Conflict Minerals (tantalum, tin, tungsten and gold, “3TG”) originating in the DRC or one of the Covered Countries that are necessary to the functionality or production of its products. If the company cannot determine if the minerals contained in the materials used to manufacture and produce one or more of its products then it must perform due diligence on its supply chain in an effort to determine how those minerals are procured. In addition, such companies must annually report and make public whether any 3TG originates from the DRC or Covered Countries. This Act aims to prevent the use of DRC 3TG that may directly or indirectly finance armed groups.

For additional details please review the SEC’s final conflict minerals rule, available at: <http://www.sec.gov/rules/final/2012/34-67716.pdf>.

Shiloh has done its due diligence in ensuring that its suppliers have reported their sources of the aforementioned minerals. We believe that our suppliers share common values and that a similar practice is used throughout the supply chain. Shiloh expects that the subject minerals contained, if any, in its purchased materials were procured in a way which does not contribute to human rights abuse in the DRC or any of the Covered Countries. Shiloh will continue to promote social responsibility to help eliminate from the industry any minerals obtained through conflict or abuse of human rights.

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