

CALIFORNIA TRANSPARENCY IN SUPPLY CHAIN ACT STATEMENT

To our Valued Customers:

The California Transparency in Supply Chains Act (CATSCA) of 2010, became effective on January 1, 2012. The act declares that slavery and human trafficking are crimes under state, federal, and international law and requires that retailers and manufacturers doing business in the state of California disclose their efforts to eradicate slavery and human trafficking from their direct supply chain.

Bollinghaus Steel, S.A. Policy is based on responsibility principles and ethical values, for continually improving our processes, practices and actions to be recognized as reference in the satisfaction of the markets' requirements, of the society and the enterprise community.

The statements below are Bollinghaus Steel, S.A. response to CATSCA requirement.

Verification of product supply chains to evaluate and address risks of human trafficking and slavery.

Bollinghaus Steel, S.A. will conduct a risk assessment in order to evaluate and address the risks of human trafficking and slavery.

Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.

Bollinghaus Steel, S.A. conducts audits of our suppliers to assess their compliance with our standards for suppliers, including those meant to eliminate trafficking and slavery in supply chains. The verification is not achieved by third parties.

Requires direct suppliers to certify that materials incorporated into products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

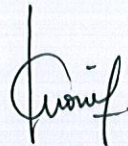
We require that our direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.

Böllinghaus Steel do not maintain a specific formal standard for addressing employees or contractors who fail to meet our expectations regarding slavery and human trafficking. However, we anticipate that a failure by one of our suppliers to comply with our expectations would result in termination of the supplier relationship. Employees who fail to comply with our expectations are subject to disciplinary action up to and including termination of employment.

Provides company employees and management, who have direct responsibility for supply chain management, training on mitigating risk with respect to ethical sourcing.

We plan to provide company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery.



João Paulo Fernandes
Quality & EHS Manager