



CONFLICT MINERALS POLICY

SCOPE

In August 2012, the United States Securities and Exchange Commission (SEC) published rules regarding Conflict Minerals, (known as '3TG' – Tantalum, Tin, Tungsten and Gold). These rules pertain to the requirements of section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).

The act requires companies to perform due diligence on the source and chain of custody of 3TG contained in their products. As Fero is committed to being a good corporate citizen we strive to ensure that our products do not contain 3TG products and that in the course of conducting our business we are ensuring the safety and protection of people that come into contact with our products and business.

PURPOSE

This policy provides the framework through which Fero will comply with Section 1502 of the Dodd-Frank Act pertaining to 3TG materials. It is applicable to all suppliers and products of Fero Ltd.

DECLARATION

1. Fero strives to have a Conflict Free supply chain, and is committed to sourcing products and materials from Non-Conflict Sources
2. Fero is committed identifying which products are impacted and targeting our efforts accordingly.
3. Fero expects that its suppliers have due diligence processes in place to identify the source of 3TG materials contained in their products, and that those sources are ethically operated.

MEASURES

1. Fero requires that suppliers implement a policy regarding 3TG minerals and exercise due diligence to investigate the source of these minerals.
2. Fero undertake to gain information from suppliers through a conflict minerals reporting template
3. As part of our supplier qualification and annual audit process we will require information from suppliers to determine whether or not materials are "conflict free"

Fero is aware of the difficulties of establishing a reasonable practice to trace conflict materials in our supply chain. We are dedicated to working with customers and suppliers to ensure that we are taking all practical steps ensuring that minerals in our products are ethically sourced. This policy has the support of the Directors of Fero.