



151 Creditview road
Woodbridge,
ONTARIO L4L9T1
CANADA

November 20, 2019

Whom it may concern

RE: Conflict Minerals Statement

Conflict Minerals' refers to minerals or other derivatives (specifically, Tin, Tantalum, Tungsten, and Gold, also known as 3TG) mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where the revenues of the 3TG minerals may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In July 2010, the United States passed the Dodd-Frank Financial Reform & Consumer Protection Act, section 1502(b) requiring all US public companies and their suppliers to disclose the chain of custody usage of conflict minerals. While BENA FASTENINGS INC. is not subject to SEC reporting, BENA FASTENINGS INC. fully supports this legislation and its position is to avoid the use of conflict minerals.

BENA FASTENINGS INC. does not procure 3TG minerals directly from mines or smelters; nevertheless, in order to comply with the applicable SEC rules and, just as importantly, to adhere to our company values, BENA FASTENINGS INC. has begun to embark upon the process of working with our suppliers to ensure that no conflict minerals will be used in our products. BENA FASTENINGS INC. is adopting standards in line with the EICC/GeSI and OECD Standard of Diligence, regarding our process to obtain chain of custody declarations from all BENA FASTENINGS INC. sourced and managed suppliers ensuring transparency in our supply chain. In addition:

- BENA FASTENINGS INC. expects its suppliers to source materials from socially responsible suppliers.
- BENA FASTENINGS INC. expects all of its suppliers to comply with the Dodd-Frank regulation (<http://www.sec.gov/rules/final/2012/34-67716.pdf>) and provide all necessary declarations.
- Suppliers must pass this requirement through their own supply chain and determine the source of specified minerals.
- Suppliers who are non-compliant to these requirements shall be reviewed by our Purchasing Organization for future business.

Sincerely yours,
Marco Bellazzi
President/Owner
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