

AJAX TOCCO MAGNETHERMIC CORPORATION DBA PINES ENGINEERING

CONFLICT MINERALS POLICY

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) approved the final rule regarding the sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Act. Under this rule, publicly traded companies must report to the SEC the source of conflict minerals in the products they manufacture or contract to manufacture if the conflict minerals are necessary to the functionality or production of a product.

The Company shares the concerns that the trade of conflict minerals mined in the eastern provinces of the Democratic Republic of the Congo (DRC) may be assisting human rights violations and environmental degradation in the region. These minerals and their refined metals - tantalum, tin, tungsten and gold (3TG) - are widely used in some of the end markets served by the Company. We support the actions of governments and organizations to increase supply chain transparency and enable companies to source conflict free minerals.

The Company supports the objectives of the legislation and sources materials from companies that share our values around human rights, ethics and responsibility. We expect our suppliers to comply with our Code of Business Conduct and meet the objectives of this conflict minerals policy. It is the responsibility of each business unit within the Company to have their respective suppliers provide all necessary declarations about the source of conflict minerals by using the EICC I GeSI Conflict Minerals Reporting Template.

The Company will disclose our progress in implementing this conflict minerals policy through public reporting, including our website and SEC reporting.