

# ***INTERNATIONAL WIRE***

International Wire Group, Inc.  
Bare Wire Division  
12 Masonic Ave  
Camden, NY 13316  
315-245-3800

29 October 2024

Dear valued customer:

As the current geopolitical landscape continues to be shaped by tragic events of ongoing violence in parts of the world, IWG has been asked to confirm compliance with current regulations pertaining to the importation of Copper products that have origin in Iran and/or Russia. The pertinent trade codes are as follows:

*Chapter 74 (Copper and Articles Thereof) Including the Subheadings Listed Below*

- *7413 (Stranded Copper Wire)*
- *7408 (Copper Wire and Copper Rod)*
- *7403 (Refined Copper / Copper Cathode)*

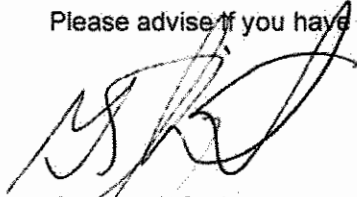
IWG Counsel has provided guidance that covers the excluded importation of these products either directly from Iran or Russia or through an intermediary country who adds value to the underlying products. In no cases are copper products or raw materials that originate from Iran or Russia allowed to be imported. Relevant excerpts from our counsel review are as follows:

1. ***U.S. persons cannot have any dealings (including importing) whatsoever with any individuals or entities designated by OFAC pursuant to E.O. 13871 (i.e., persons operating in the iron, steel, aluminum, or copper sector of Iran). All property and interests in property that are in the United States of persons designated by OFAC pursuant to E.O. 13871 are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in.***
2. ***Even in the absence of an OFAC-designated counterparty, U.S. persons are prohibited from knowingly engaging in a significant transaction for the purchase, acquisition, sale, transport, or marketing of copper, or copper products from Iran. Failure to comply with these restrictions could expose U.S. persons from themselves being designated by OFAC as restricted parties.***
3. ***As noted, U.S. persons are prohibited from engaging in transactions with designated persons or entities. Therefore, if the copper originates from a designated Russian entity pursuant to any of OFAC's Russia-related sanctions, the transaction would be in violation of U.S. sanctions laws.***
4. ***Moreover, the import into the U.S. of Russian-origin copper produced after April 13, 2024, which has not been incorporated or substantially transformed into other products outside of Russia, would also be prohibited.***

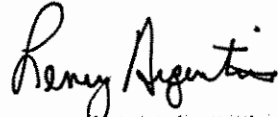
Upon our review and knowing that some may not be as focused on this issue, we wanted to confirm that we are in full compliance with this framework, and will continue to be. IWG does not import any

copper products whose origin is Iran and/or Russia. Rest assured, we will continue to be in compliance with all U.S. law related to this subject.

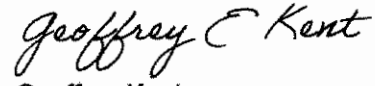
Please advise if you have any questions.



Gregory J. Smith  
CEO



Lenny Argentine  
VP Sales and Marketing



Geoffrey Kent  
VP Procurement and Logistics