



PHOENIX AMERICA INC.

4717 CLUBVIEW DRIVE
FORT WAYNE, IN 46804

April 30, 2015

To Whom it May Concern,

Subject: Phoenix America Inc. Conflicts Materials Statement

We are in receipt of your correspondence requesting our confirmation that we comply with the Conflict Minerals provision of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act").

Although we are a privately held company and per the act not required to comply with the Act, we recognize that many of our customers are required to comply and that input by Phoenix America is needed. As such, we strive to comply with the 'Spirit of the Act'.

The purpose of this document is to address this "Conflict Minerals" rule formalized on August 22, 2012 by the US Securities and Exchange Commission as directed by section 1502 of the Dodd Frank Act of 2010.

To our knowledge none of the minerals named as "Conflict Materials" from Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda or Zambia are used in the construction of any Phoenix America Inc. products.

Phoenix America Inc. will monitor our supply chain and will comply with "Conflict Minerals" rule if any of our raw material suppliers are found in violation of this provision.

To that end, we are in the process of conducting our due diligence obligations as required by the Act. Specifically, we are (i) surveying all of our suppliers and asking them to complete the EICC GeSI form and (ii) developing Phoenix America's policy and reasonable due diligence standards on Conflict Minerals (as defined by the Act) and requiring our suppliers to develop similar policies and procedures.

Recognizing that there are many layers in the supply chain between our suppliers and the smelters of Conflict Minerals that may be in the products supplied to us, our ability to respond to your request is limited by our suppliers' ability to respond to our request that they confirm they are "DRC conflict free". At this time we can confirm that we are aware of the requirements of the Act, we are conducting due diligence on our supply base and we are developing policies with respect to Conflict Minerals that we will make public as required by the Act once finalized. Until we are able to complete our diligence, we have completed the EICC GeSi Form to the best of our current knowledge.

Let me know if you have any additional questions with regard to "Conflict Minerals" and PAI products

Sincerely,

Scott Mentzer
VP Sales & Marketing
Phoenix America, Inc.