

Conflict Minerals Policy

Conflict minerals are minerals mined in conditions of armed conflict and human rights abuses, and which are sold or traded by armed groups. This has for some years been a particular problem in the DRC (Democratic Republic of Congo).

Conflict minerals in the eastern DRC are generally defined (including in US legislation and the OECD due diligence guidance for responsible mineral supply chains) as cassiterite (tin), coltan (tantalum), wolframite (tungsten) and gold, or derivatives of these minerals. Sometimes these minerals are referred to as the 'three Ts' - tin, tantalum and tungsten (and gold).

We predominantly manufacture using steel and its alloys rather than those expressed as conflict materials.

Our aim is to always ensure that business activities do not contribute to conflict and as a downstream user we recognise that where we are requested to manufacture products using potential conflict material or derivatives from them, that we complete due diligence to ensure that we are aware of origin by requesting proof of origin.

These actions are taken to enforce our commitment to assist the UK Government and its' International Partners in preventing conflict, with building stability overseas and to improve the protection of human rights (including the prevention of sexual violence) and the rule of law.

All employees within our company having a role within the purchasing and selection of supplier function are aware of the responsibility they have for upholding this policy and adhering to it. They have received training and instruction to support this.

We have included our due diligence process our supplier evaluation process of our quality management system which is registered to BSEN ISO9001. It is subject to scrutiny through independent audit to ensure that we maintain compliance and adopt the directives of this policy.

Any supplier which does not pass the due diligence process will be removed from our approved supplier list.

This policy should be read in conjunction with our Corporate Social Responsibility Policy and Modern Slavery and Whistleblowing Policy.

Simon Riley Managing Director