

Conflict Minerals Policy

Introduction

Metaltech Precision Ltd is committed to preventing conflict, building stability, improving the protection of human rights and the rule of law. It is acknowledged that the business has a key role to play in respecting human rights through responsible operations and respecting all relevant national and international laws and standards. The procedures set out in this policy document are to help ensure that any trading relating to natural resources from the DRC or products including components incorporating such minerals will be conducted in a way which is socially, economically and environmentally acceptable, including adhering to the relevant voluntary OECD guidance and guidelines.

Background

In politically unstable areas, armed groups often use forced labour to mine minerals. They then sell those minerals to fund their activities, for example to buy weapons. Conflict Minerals may find their way into products. In August 2012, the United States Securities and Exchange Commission ("SEC") issued its final rules regarding "Conflict Minerals" (known as '3TG' – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the DRC and the adjoining countries named in the Act.

A new EU law to address the trade in Conflict Minerals was passed in May 2017 to stop:

- Conflict Minerals and metals from being exported to the EU.
- Global and EU smelters and refiners from using Conflict Minerals.
- Mine workers from being abused in connection with Conflict Minerals.

The law also supports the development of local communities. It requires EU companies to ensure they import these minerals and metals from responsible sources only. It became a legal requirement on 1 January 2021.

Due Diligence

Due diligence is utilized to evaluate all suppliers. Any suppliers who provide materials or components that contain tin, tantalum, tungsten and gold will be reviewed and approved based on ability to assure conflict free minerals used in their products. When applicable, we require suppliers to provide compliance documentation.

Commitments

Metaltech Precision Ltd is working towards ensuring that its products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the DRC or adjoining countries.

The business is committed to:

- Identifying which products are impacted and targeting our efforts accordingly.
- Not buying products and materials containing Conflict Minerals unless originally confirmed.
- Will take all reasonable measures to ensure compliance with the Act and all UK and EU legislation.

Review and Approval

This policy is approved by the Managing Director and will be reviewed annually and updated, as necessary.



Managing Director
31/08/2023