



Corporate Policy for Avoiding Conflict Minerals in the Supply Chain D969 13th March 2023

Purpose:

To ensure that our company does not knowingly purchase or use conflict minerals in our products or supply chain. This policy applies to all suppliers and business partners that provide materials or products to our company.

Policy:

Our company is committed to responsible sourcing practices and does not tolerate the use of conflict minerals in our supply chain. Conflict minerals refer to minerals that are mined in conditions of armed conflict and human rights abuses, particularly in the Democratic Republic of Congo (DRC) and adjoining countries.

Our company prohibits the use of conflict minerals, including but not limited to tin, tantalum, tungsten, and gold (3TG), in our products and supply chain. We require our suppliers to comply with this policy and conduct due diligence to ensure that their products do not contain conflict minerals.

We expect our suppliers to:

- Identify the sources of the minerals used in their products and provide evidence of due diligence in determining the origin of these minerals.
- Conduct reasonable due diligence on their supply chain to identify the presence of conflict minerals and take appropriate action to address any identified risks.
- Require their suppliers to comply with this policy and conduct due diligence on their own supply chain to identify the presence of conflict minerals.
- Provide written assurance that the minerals used in their products are not sourced from conflict-affected areas.
- Promptly communicate any known or suspected use of conflict minerals in their products to our company.

Our company reserves the right to terminate any business relationship with a supplier who fails to comply with this policy or provide sufficient evidence of due diligence.

Implementation:

Our company will implement this policy through the following steps:

- Communicate this policy to all suppliers and business partners who provide materials or products to our company.
- Incorporate conflict mineral sourcing requirements into our supplier contracts.
- Conduct reasonable due diligence on our supply chain to identify the presence of conflict minerals.
- Report annually on our due diligence efforts and the progress made towards achieving our conflict mineral sourcing objectives.
- Work with industry stakeholders to promote responsible sourcing practices and collaborate with other companies to address systemic challenges in the supply chain.

Compliance with this policy is essential to our company's reputation and our commitment to ethical business practices. Our company expects all suppliers and business partners to fully support and comply with this policy.

Effective Date:

This policy is effective immediately and will be reviewed and updated on an annual basis to reflect changes in our business practices and evolving industry standards.

Signed for and on behalf of: Holroyd Components Ltd

Place of issue: Saffron Walden, Essex

Date of issue: 13th March 2023

Name: Alex Marlow

Position: Procurement Manager

Signature:

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