

Testbourne - Responsible Minerals and Supply Chain Policy - v1

1. Purpose

Testbourne is committed to conducting business ethically and responsibly throughout its supply chain. As a supplier and distributor of high-purity materials, single crystals, wafers, evaporation sources, ceramic-to-metal components, thin-film measuring and control equipment, sample preparation products, and industrial microwave equipment, we seek to source materials from suppliers who share our commitment to human rights, ethical business practices, and responsible sourcing.

This policy establishes Testbourne expectations regarding the sourcing of minerals and materials that may originate from conflict-affected and high-risk areas (CAHRAs) and forms part of our broader commitment to responsible supply chain management.

2. Scope

This policy applies to:

- Testbourne employees involved in purchasing and supplier management.
- Existing and prospective suppliers.
- Contractors, agents, and business partners supplying products or materials to Testbourne.

3. Commitment to Responsible Sourcing

Testbourne supports the principles contained within:

- Regulation (EU) 2017/821 concerning responsible sourcing of tin, tantalum, tungsten and gold (3TG).¹
²
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.³⁴
- We are committed to identifying, assessing and managing risks within our supply chain and expect our suppliers to adopt equivalent standards.

¹<https://eur-lex.europa.eu/eli/reg/2017/821/2020-11-19/eng>

²https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_en

³<https://www.cnb.cz/en/financial-markets/the-cnbs-gold/due-diligence-in-the-gold-supply-chain-in-accordance-with-regulation-eu-2017-821-of-the-european-parliament-and-of-the-council/>

⁴<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0821>



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www.testbourne.com

Main Office: Testbourne Ltd, Unit C The Loddon Centre, Wade Road, Basingstoke, Hampshire, RG24 8FL, UK

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4. Standards and Prohibited Practices

Testbourne will neither tolerate nor knowingly support:

Human Rights Abuses

- Torture, cruel, inhuman or degrading treatment.
- Forced or compulsory labour.
- Child labour.
- Human trafficking.
- Sexual violence.
- Other gross human rights abuses.

Conflict Financing

- Direct or indirect support to non-state armed groups.
- Payments or benefits that contribute to armed conflict.
- Illegal taxation, extortion, or exploitation associated with mineral extraction, transport, trade, handling, or export.

Corruption and Financial Crime

- Bribery or corruption.
- Fraudulent misrepresentation of material origin.
- Money laundering.
- Deliberate concealment of supply chain information.

These commitments reflect the risk categories set out in Annex II of the OECD Due Diligence Guidance, which underpins the EU Conflict Minerals Regulation. ^{5 6}

⁵<https://www.cnb.cz/en/financial-markets/the-cnbs-gold/due-diligence-in-the-gold-supply-chain-in-accordance-with-regulation-eu-2017-821-of-the-european-parliament-and-of-the-council/>

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5. Supplier Requirements

Testbourne expects suppliers to:

1. Maintain systems to identify the origin of minerals and materials supplied.
2. Exercise due diligence over their own supply chains.
3. Provide information on the source of minerals upon request.
4. Cooperate with reasonable enquiries relating to responsible sourcing.
5. Notify Testbourne promptly if significant supply chain risks are identified.
6. Flow down these requirements to their suppliers and subcontractors.

Where applicable, suppliers may be requested to provide:

- Conflict Minerals Reporting Template (CMRT) declarations.
- Due diligence records.
- Evidence of sourcing from recognised responsible smelters or refiners.

6. Risk Assessment and Mitigation

Where Testbourne becomes aware of potential risks associated with sourced materials, we will:

- Assess the nature and severity of the risk.
- Engage with the supplier to obtain additional information.
- Request corrective actions where appropriate.
- Monitor implementation of corrective actions.
- Suspend or terminate supplier relationships where serious issues remain unresolved.

7. Record Keeping

Testbourne will maintain relevant purchasing, supplier and due diligence records in accordance with applicable legal and business requirements.



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8. Reporting Concerns

Employees, suppliers, and other stakeholders are encouraged to report concerns relating to:

- Human rights abuses;
- Conflict minerals;
- Unethical sourcing practices; or
- Breaches of this policy.

Reports may be submitted confidentially to:

Email: chris@testbourne.com

All concerns will be reviewed appropriately and without retaliation against those raising concerns in good faith.

9. Communication

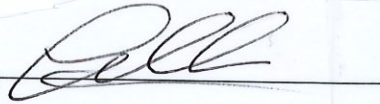
This policy will be:

- Published on the Testbourne website.
- Made available to suppliers upon request.
- Referenced during supplier onboarding and review activities.
- Reviewed periodically and updated as necessary.

10. Approval

Testbourne is committed to continually improving its supply chain transparency and responsible sourcing practices.

Signed:



Chris Mihill - CEO
Testbourne Ltd



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