

Our Organisation's Strategy to Manage Conflict Mineral Risks and Minimise Adverse Impacts

1. Commitment and Governance

- We maintain a Conflict Minerals Policy aligned with the OECD (**Organisation for Economic Cooperation and Development**.) Due Diligence Guidance, publicly available and communicated to suppliers.
- A cross-functional team (e.g., procurement, compliance, legal, and sustainability) oversees implementation.
- Senior leadership supports and reviews risk mitigation efforts as part of ESG governance.

2. Supplier Engagement and Requirements

- We require suppliers to:
 - o Comply with our Conflict Minerals Policy.
 - o Complete the **Conflict Minerals Reporting Template** (CMRT) annually.
 - o Source only from **Responsible Minerals Assurance Process** (RMAP) conformant smelters or equivalent verified sources.

Suppliers are contractually obligated to support due diligence efforts and provide transparent data.

3. Risk-Based Due Diligence

- We assess conflict mineral risks by:
 - o Mapping supply chains down to smelters and refiners.
 - o Evaluating supplier responses and conducting risk-based reviews.
 - o Prioritising high-risk geographies and actors (e.g., the Democratic Republic of Congo and adjoining countries).



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4. Risk Mitigation Measures

- If risks are identified, we take the following steps:
 - Work with suppliers to develop **Corrective Action Plans** (CAPs) with clear Timelines.
 - Encourage transition to certified, responsible smelters if a non-conformant source is found.
 - Escalate or terminate relationships with suppliers who fail to make improvements.
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5. Auditing and Verification

- We rely on:
 - Third-party audits of smelters (e.g., RMAP audits - **Responsible Minerals Assurance Process**)
 - Internal reviews of supplier declarations and documentation.
 - Independent assessments for high-risk suppliers or regions.
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6. Training and Capacity Building

- We provide training programs for internal staff and suppliers to raise awareness of conflict mineral risks and best practices.
 - We support supplier development initiatives, particularly for small and medium enterprises, to help them align with due diligence expectations.
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7. Monitoring and Continuous Improvement

- We conduct annual reassessments of conflict mineral risks and update supplier evaluations accordingly.
 - Our due diligence approach is reviewed periodically and improved based on:
 - o Industry best practices,
 - o Stakeholder feedback,
 - o Changes in regulatory or geopolitical environments.
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8. Transparency and Reporting

- We will aim publish an annual Conflict Minerals Report, disclosing:
 - o Our due diligence process,
 - o Risk mitigation efforts,
 - o the list of known smelters and refiners used,
 - o Progress on eliminating high-risk sources.



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