

Conflict Minerals Policy

Overview

US legislation and OECD due diligence guidance generally define conflict minerals as cassiterite (tin), coltan (tantalum), wolframite (tungsten) and gold (or derivatives of these minerals) (collectively referred to as “3TG”) and which are mined in the Democratic Republic of Congo (“DRC”) or an adjoining country (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia), and directly or indirectly finance or benefit armed groups in the DRC or any adjoining country.

Scope

This policy relates to all purchases of raw materials or components made by the group at any operational site.

Target(s) and commitments

As part of complying with United Nations Sustainable Development Goal (UN SDG) 10 “Reduced Inequalities”, the Group is committed to conducting business with integrity and in a responsible, ethical and sustainable manner throughout our global supply chain. Consistent with this commitment, all sourcing of raw materials containing 3TG must adopt procedures, to the extent required by applicable laws or customer expectations, to seek to identify whether such 3TG minerals are sourced responsibly and from conflict-free regions (“3TG Conflict Free”), taking a risk-based approach.

The Group has a zero-tolerance policy for purchases classified as Conflict Minerals.

Management

Responsibility for our sustainability purchasing is governed at the highest levels as part of our social responsibility. The Group Chief Executive is ultimately responsible for the management of all sustainability-related topics. Management of individual topics is done within the appropriate divisional and functional teams with oversight by the ESG Committee.

All suppliers are required to confirm that they comply with Conflict Minerals legislation in their upstream sourcing. The Group reserves the right to periodically request from its suppliers any information it deems necessary, including certifications and documentation, to monitor and determine compliance with this policy. The Group also reserves the right to consider, on a risk-based basis, performing independent third-party audits on suppliers.

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