



As a socially responsible company, Cooper Turner Beck (CTB) has a concern for the well being of people and communities. We conduct business in a fair and ethical manner, respect human rights, comply with laws and regulations and follow a rigorous Code of Conduct.

CTB supports the efforts of human rights organisations to help stem the trade in four minerals – tin, tantalum, tungsten and gold – commonly referred to as 3TG. Armed groups fight for control of the mines and use forced labour to mine and sell the minerals, which in turn funds on-going violence.

The countries or areas considered to be “conflict-affected or high-risk” (CAHRAs) are those:

- Whose natural resources include minerals which are in high demand, either locally, regionally or globally.

and

- Are either suffering from armed-conflict, such as civil war, a state of fragile post-conflict, or witnessing weak or non-existing governance and systematic violations of international law, including human rights abuses.

CTB’s Conflict of Minerals policy aims to meet the requirements of both the 2010 US legislation known as the Dodd Frank Act Section 1502 and also the new EU Conflict Minerals regulation passed on the 1 January 2021. Our approach is to work towards meeting both regulations and as such the list of affected countries is now defined in the link below (updated quarterly):-

<https://www.cahraslist.net/cahras>

The list of affected countries still includes the regions of the Democratic Republic of Congo (DRC) and nine adjoining countries; Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda) but it has been expanded to meet the EU regulations to include in its assessment not only regions associated with production and extraction, but also those associated with other parts of the supply and value chain.

CTB have initiated a process framework to meet the regulatory requirements and will file the necessary documentation in accordance with the required timing. This includes establishing compliance requirements for our direct suppliers regarding conflict of minerals, implementing controls and reporting, undertaking appropriate sourcing efforts and providing our customers the data necessary to facilitate their reporting.

Expectations for Suppliers

In support of CTB’s Conflict of Minerals policy, suppliers are expected to supply materials which are “CAHRAs Conflict Free” from the countries defined in the above hyperlink.

Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. CTB expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

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In the event that CTB determines that a supplier's efforts to comply with this policy have been deficient and the supplier fails to co-operate in developing and implementing reasonable remedial steps, CTB reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Under the definition of "Conflict of Minerals", products supplied to CTB:-

1. Do not contain tantalum, tin, tungsten or Gold (3TG) as elements necessary to their production or functionality, or,
2. If products supplied to CTB do contain these minerals, the minerals must originate outside of the Conflict Affected and High Risk Areas (CAHRA's), come from scrap or recycled sources or be supplied from smelters that have been validated by an independent private sector party to be conflict free.

CTB will survey direct suppliers as part of our conflict minerals due diligence program. Suppliers are expected to respond to the survey requests in a timely manner and with full disclosure following the specific instructions provided.

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