

Group Policy

Conflict Minerals Statement



Introduction

In the broadest context, a conflict mineral is defined as tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas. There is different legislation worldwide, such as:

- Due Diligence Guidance for the Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, from the OECD (<http://www.oecd.org/fr/daf/inv/mne/mining.htm>)
- Section 1502 of the Dodd Frank Act, from United States (<https://www.sec.gov/news/press-release/2012-2012-163htm>)
- Conflict Minerals Regulation, from the European Union (<http://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/>).

All of them have common goals, including, but not limited to:

- Stop conflict minerals and metals from being exported to other parts of the world.
- Stop global and EU smelters and refiners from using conflict minerals
- Stop mine workers from being abused

Welding Alloys Commitment:

Following its strong ethical values:

- Welding Alloys complies with all applicable international regulations.
- Welding Alloys commits to periodical reviews that ensure it always remains compliant of the most up-to-date, applicable regulation.
- Welding Alloys is also prepared to disclose documentation supporting its claims.
- Welding Alloys categorically rejects the use of conflict minerals, and as such, it also demands from all its suppliers the same high standards imposed on itself.

This policy has been approved by the Board of Directors and will be reviewed annually.

A handwritten signature in black ink, appearing to read 'D. Stekly', is written over a white background.

Dominic Stekly

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