



Conflict Minerals Policy

1. Purpose

This policy publicly commits Emjay Engineering Ltd to work collaboratively to eradicate conflict minerals from the goods and services it produces and buys.

2. Background

Profits from mining around the world may be being used to fund armed conflict, as many mines are under the control of armed groups who may have committed killings, violence, rape, and other human rights abuses. The most widely cited instance of conflict minerals is in the Democratic Republic of Congo and neighboring countries (Sudan, Central African Republic, Uganda, Angola, Tanzania, Rwanda, Burundi, and Zambia) where tin, tungsten, tantalum and gold are mined. These minerals can be used in the manufacture of precision machined components. Other examples of minerals with potential links to conflict include copper, cobalt, platinum and diamonds. A number of initiatives have been developed to break the link between mineral extraction and conflict, such as certified conflict-free smelters and refiners. While some steps are already being taken in the procurement processes used by the Emjay Engineering Ltd to avoid conflict minerals in our supply chains, namely asking questions to suppliers during the selection/re-evaluation stage, there is a need for increased visibility of these efforts, and for further action. Efforts to reduce any links our procurement practices may have to funding conflict reflect Emjay Engineering Ltd.'s wider commitment to social responsibility and sustainability.

3. Scope

Emjay Engineering Ltd understands the term conflict minerals to mean any minerals that have been found to be being used to fund conflict in any part of the world. This is broader than a common understanding of conflict minerals to include only tin, tungsten, tantalum and gold mined in the Democratic Republic of Congo and surrounding Great Lakes Region of Sub-Saharan Africa. While the focus of this policy is on conflict minerals, it is recognised that a conflict mineral-free claim does not guarantee that human rights of workers are respected. This policy forms part of a broader approach to socially responsible supply chains.



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4. Commitment

Emjay Engineering Ltd supports industry-wide efforts to identify, reduce, and hopefully eliminate the use of conflict minerals originating in the DRC and adjoining countries that finance or benefit groups committing human rights violations. In furtherance of this goal, Emjay engineering Ltd commits to use the Responsible Minerals Initiative's (RMI) Conflict Minerals Reporting Template (CMRT) to gather and exchange supply chain information on an annual basis and make this information available to our customers upon request. Emjay Engineering Ltd is committed to a due diligence process that aligns as far as possible with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).

5. Expectations

Emjay Engineering Ltd expects all its suppliers to undertake due diligence with their supply chains to ensure that conflict minerals are only sourced from mines and smelters outside of conflict-affected and high-risk areas. We do not encourage implementing a de facto embargo on conflict-affected and high-risk areas in the sourcing of the respective minerals, but we actively support the development of effective due diligence processes in our industry. This follows the guidance of many internationally active human rights organizations and complies with the principles of non-discrimination regarding supplier selection and treatment.

Emjay Engineering Ltd requests suppliers to disclose their sourcing origins by using a Conflict Mineral Reporting Template (CMRT) or equivalent certified documents when requested once a year.

Emjay Engineering Ltd requests suppliers to notify Emjay Engineering Ltd immediately and actively if changes are made in materials or sources after providing a CMRT or equivalent certified documentation.

In the event that Emjay Engineering Ltd determines a supplier has failed to develop and implement reasonable steps to comply with this policy, Emjay Engineering Ltd reserves the right to take appropriate action, which may include discontinuing the business relationship with the supplier.

Directors

Adam Simpkins

Joe Matthews