
CONFLICT MINERALS POLICY



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PART 1 – KEY POINTS OF SIGNIFICANCE¹

1. PRACTICAL / PROCEDURAL IMPLICATIONS

- 1.1 Please review whether your business engages in activity that involves tin, tantalum, tungsten, gold or derivatives of those minerals (3TG).
- 1.2 If so, to the extent required by applicable laws or customer expectations, please ensure that strict procedures are implemented that seek to identify whether such minerals are sourced responsibly and from conflict-free regions. Such procedures may include seeking to identify smelters and/or refiners and/or sourcing in the supply chain, seeking to identify sourced minerals' country of origin, cooperating with key stakeholders, and seeking to perform an appropriate level of due diligence.
- 1.3 Please ensure that your business's supplier code of conduct imposes requirements on suppliers to ensure they do not deal in conflict minerals.

2. TRAINING

- 2.1 As a matter of good supply chain risk management, to the extent your business has dealings in 3TG minerals, it will be important to provide training to relevant personnel and, where appropriate, suppliers, to improve awareness of conflict minerals risks and to achieve buy-in from key stakeholders to comply with the procedures imposed (where required) relating to conflict minerals.
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¹ Please note this is a non-exhaustive summary. The full policy should be reviewed and assessed for further training, practical and procedural implications and updates that are specific to your business.

PART 2 - CONFLICT MINERALS POLICY

1. PURPOSE

- 1.1 The purpose of this policy is to set out the expectations of Melrose Industries PLC and its business units (collectively referred to as the “**Group**”) towards the Group’s suppliers with regards to conflict minerals.

2. POLICY STATEMENT

- 2.1 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.
- 2.2 The Group is committed to conducting business with integrity and in a responsible, ethical and sustainable manner. This applies both to our business operations and to our global supply chain. Consistent with this commitment, all Melrose business units that source products or raw materials containing 3TG shall 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. This policy sets out our expectations of suppliers in respect of due diligence steps and related reporting to the relevant business unit in connection with 3TG materials.
- 2.3 This policy has been approved by the board of directors of Melrose Industries PLC, who are responsible for ensuring this policy complies with relevant legal and ethical obligations.
- The General Counsel for each business within the Group is responsible for ensuring awareness of and compliance with this policy within their particular business unit.
- Each business within the Group is expected to establish a “culture” of compliance with this policy. The executive team of each business must take direct responsibility for ensuring effective transmission of this policy throughout their business unit, together with relevant guidance and training, and appropriate safeguards, monitoring, and resources, in order to ensure compliance with this policy.

3. SUPPLIER EXPECTATIONS

- 3.1 We expect our suppliers to operate their businesses in a way that supports our commitment to acting ethically and responsibly. All

business units have a supplier qualification process which as a minimum, requires suppliers to sign the respective business unit's Supplier Code of Conduct or equivalent policy and, depending on the determined level of risk, may also result in an audit or further reviews.

- 3.2 In accordance with this policy, all Melrose business units that source products or raw materials containing 3TG shall, to the extent required by applicable laws or customer expectations, work with their supply chain partners to ensure compliance with all applicable laws and regulations and seek to identify whether 3TG materials sourced by that business unit are considered 3TG Conflict Free, taking a risk-based approach. As a minimum, relevant suppliers are required to:
- (a) perform due diligence to ascertain whether any 3TG minerals in products are conflict free; and
 - (b) complete the Responsible Minerals Initiative reporting template or equivalent, as required by the respective business division.
- 3.3 A business unit may impose stricter requirements than those set out in paragraph 3.2 on its supply chain partners under its own division's Supplier Code of Conduct or equivalent policy.
- 3.4 In addition, where applicable local laws and regulations exist in the jurisdiction in which the supplier operates, we expect our suppliers to comply with such laws and regulations.
- 3.5 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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