



## CONFLICT MINERALS POLICY STATEMENT

Minerals mined in the Democratic Republic of Congo (DRC) and adjoining countries may be making their way into the supply chain. Some mining operations in the DRC have been linked to poor labour and environmental practices, and there is evidence that some mining and transportation of minerals in the Eastern provinces of the Democratic Republic of Congo (DRC) are funding conflict in the country by funding illegal armed groups. As part of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange Commission (SEC) passed legislation which requires U.S. companies to report on the origin of these conflict minerals including tin, tantalum, tungsten and gold.

SFC (Europe) Ltd is committed to ethical practices and compliance with all applicable laws and regulations. While we do not source these metals directly, they may exist in the materials and components we source. We are therefore committed to working with our suppliers to responsibly source the materials and components we use in manufacturing our products which may contain these minerals. To comply with our customers expectations relating to conflict minerals, SFC (Europe) Ltd requires documented declarations from our suppliers to verify the origin of any conflict minerals contained in their products.

In addition, we require the following from our suppliers:

- to source materials from socially responsible sub-tier suppliers and manufacturers
- to assist us to comply with any requests or regulations related to conflict minerals and to provide all necessary declarations
- to undertake reasonable due diligence within their supply chain to determine the origin of the conflict minerals, including developing policies and management systems preventing the use of conflict minerals or derivative metals sourced from mines that directly or indirectly finance armed groups through mining or mineral trading in the DRC or any adjoining country, and to pass these requirements along to their sub-tier suppliers and require them to do the same with lower tiers of suppliers.

In addition, we will work with our suppliers to seek remedies for non-compliance.

The process of tracing the conflict minerals through the supply chain is complicated and timeconsuming. Therefore, we will rely on industry initiatives, such as the Conflict Free Smelter Program and the cooperation of our raw material suppliers to obtain the necessary information from sub-suppliers in order to achieve compliance to the reporting requirements on conflict minerals.

SFC (Europe) Ltd is committed to working with our suppliers to ensure effective implementation of this policy in order to achieve compliance to relevant legislation.