



Supporting
Policy
Documents
Level 6

Conflict Minerals Policy

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Conflict Minerals Policy

APPROVAL

The signatures below certify that this policy has been authorised and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by				
Reviewed by				
Approved by				

AMENDMENT RECORD

This policy is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date

COMPANY PROPRIETARY INFORMATION

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Introduction

‘Conflict minerals’ are those mined in countries where armed conflict and human rights abuses are a concern. These minerals include:

- columbite-tantalite, also known as coltan (the metal ore from which **Tantalum** is extracted),
- cassiterite (the metal ore from which **Tin** is extracted),
- wolframite (the metal ore from which **Tungsten** is extracted),
- **Gold**

These have become known as 3TG. The mining and sale of 3TG in the Democratic Republic of Congo (DRC) and adjoining countries (collectively known as the ‘covered countries’), comprising of:

- Democratic Republic of Congo
- Central African Republic
- Sudan
- Zambia
- Angola
- Congo Republic
- Tanzania
- Burundi
- Rwanda
- Uganda

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These ‘covered countries’ have contributed to the funding of conflicts and in creating a humanitarian crisis.

On July 21, 2010, the Dodd-Frank Wall Street reform and Consumer Protection Act was signed into U.S law. Section 1502 of this Act is a disclosure requirement that calls upon companies to determine whether their products contain ‘conflict minerals’ – by carrying out supply chain due diligence – and to report this to the Securities and Exchange Commission (SEC).

Silent Sentinel’s position on responsible sourcing of minerals

Silent Sentinel understands the importance of this issue to its customers and is committed to its responsibility to work towards a ‘conflict free’ supply chain and increased transparency within the market.

Silent Sentinel does not directly purchase any minerals from any source; however it is well into the process of carrying out the appropriate supply chain due diligence guidance. As part of the process for the engagement of new suppliers, Silent Sentinel is using its supplier assessment questionnaires /audit checklist:

- SSPOR-0011 Supplier Audit Checklist
- SSPUR-0030 SCN Self Assessment
- SSPUR-0031 SCP Self Assessment

These cover both supply chain partners and network entities, requiring direct confirmation that any ‘conflict minerals’ in materials we purchase do not support armed groups in the ‘covered countries’ and suppliers must also make a declaration that their full supply chain has been duly examined to confirm this. We monitor the relevant suppliers and require them to provide a completed CRMT (**SSPUR-0035 RMI CMRT Conflict Minerals Reporting Template**) as

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part of our assessment process. Should they not have certified their supply chain and are not prepared to do so we will migrate to an alternative supplier if that is possible.

Suppliers who supply components, parts or products containing 3TG are expected to source those minerals from ethically and socially responsible sources that do not directly or indirectly contribute to conflict. Suppliers are expected to, directly and indirectly, source 3TG only from sources that do not directly or indirectly benefit or finance armed groups in the DRC or another covered country, in each case within the meaning of the SEC Rule. Among other things, we expect our suppliers to, where possible, source 3TG from smelters and refiners that are validated as being 'conflict-free' and otherwise implement, and require their direct and indirect suppliers to implement, policies, protocols, standards, systems, frameworks and procedures that are consistent with the SEC Rule and the Organization for Economic Co-operation and Development's (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Suppliers who do not comply with these expectations will again be reviewed and evaluated accordingly for future business and sourcing decisions.

In accordance with section 1502 of the Act - supply chain due diligence - we encourage our suppliers to adopt this policy regarding 'conflict minerals' in order to help prevent the funding of violence and human right violations associated with the mining of 3TG.

It should be noted that amongst our suppliers there may be very large international corporations, who are striving to be 'conflict-free' but as yet are not able to fully comply with the requirements. There are also smaller suppliers to whom 'conflict minerals' is a new issue. We will continue to monitor this position and in due course this may influence our supply chain decisions.

Suppliers will continue to be required to comply with complementary policies of Silent Sentinel, including those relating to corruption, money-laundering, and bribery.