



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
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Reviewed by	Paul Elsey	Paul Elsey	Managing Director	28/7/22
Approved by	Paul Elsey	Paul Elsey	Managing Director	28/7/22

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
All	First issue.	A	27/6/18
All	Policy review.	B	15/10/20
All	Added paragraph about Regulation (EU) 2017/821.	C	28/7/22

COMPANY PROPRIETARY INFORMATION

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Conflict Minerals Policy

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 Democratic Republic of Congo (DRC) and adjoining countries mine and sell 3TG. These adjoining 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).

In 2017, Regulation (EU) 2017/821 of the European Parliament and of the European Council of 17 May 2017 was passed concerning supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict affected and high-risk areas.

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.

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Silent Sentinel does not directly purchase any minerals from any source; however, it has carried out the appropriate supply chain due diligence.

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 who do not comply will again be reviewed and evaluated accordingly for future business and sourcing decisions.

We encourage our suppliers to adopt a policy regarding 'conflict minerals' in order to help prevent the funding of violence and human right violations associated with the mining of 3TG.