

## **Conflict Minerals Policy**

Drallim Industries Limited shall, where practical, ensure that they do not use or supply any components, metals or any other products that contain Tin, Tungsten, Tantalum and Gold (Conflict Minerals) as identified in the "Dodd-Frank Wall Street Reform and Consumer Protection Act".

## As a company Drallim Industries Limited....

- Do not directly purchase raw metal ores that may be used in the manufacture of our products from smelters or mines.
- Purchase processed raw materials that may contain minerals listed as conflict minerals
  as part of their composition from our own suppliers that are several steps removed from
  the mining and processing of these metals. As a result, we do not have definitive
  knowledge of their source.
- Purchase manufactured parts from our own approved suppliers who may also purchase raw materials which have conflict minerals as part of their composition.
- Encourage our suppliers to apply due diligence to the purchase of their raw materials by asking their suppliers and sub-tier suppliers about the presence, source and origin of any Conflict Minerals in their products, and that this information will be shared with Drallim Industries Limited.
- Will continually evaluate our policy to ensure compliance with the conflict minerals ruling and, when necessary, amend this document.

Drallim industries understand that the process of tracing Conflict Minerals through a global supply chain is complicated and time-consuming and some suppliers or sub-suppliers may lack the resources to trace minerals all the way back to their source.

Drallim Industries Limited will endeavour in good faith to have its suppliers exercise

reasonable due diligence to evaluate their respective supply chains for the information called for by the Conflict Minerals rule.

As the Accountable Manager it is my responsibility to ensure the controls that we put in place and steps that we take to prevent the purchase of materials containing conflict minerals are adhered to and regularly reviewed for their effectiveness by our procurements team, and that these controls are flowed down to our suppliers.

David Mooney Managing Director

January 2017

Last review date: 20th January 2017

Reference information:

Conflict Minerals are essentially Tin, Tungsten, Tantalum and Gold that are mined either in the Democratic Republic of Congo ("DRC") or one of nine African nations that share a border with the DRC (the "DRC Region").

**DRALLIM INDUSTRIES LIMITED** 

**GROUP QUALITY CONTROL** 

**STA006** 

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