

COP-028: CONFLICT MINERAL POLICY

1. FOREWORD

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act raises concerns that the trading of Conflict Minerals finances armed conflict in the Democratic Republic of Congo (DRC) and the surrounding countries and are contributing to an emergency humanitarian crisis.

Certain companies are required to disclose their use of conflict minerals if those minerals are “necessary to the functionality or production of a product” manufactured by those companies.

Under the Act, those minerals include Tantalum, Tin, Tungsten and Gold (3TGs).

2. SCOPE

Under the final rule of the Act, a company that uses any of the designated minerals is required to conduct a reasonable ‘country of origin’ inquiry that must be performed in good faith and be reasonably designed to determine whether any of its minerals originated in the covered countries or are from scrap or recycled sources.

If it is found that the minerals did not originate in the covered countries or are from scrap or recycled sources, or if the company has no reason to believe that the minerals may have originated in the covered countries or may not be from scrap or recycled sources, then the company must disclose its determination, provide a brief description of the inquiry undertaken and the results of the inquiry.

If the company knows or has reason to believe that the minerals may have originated in the covered countries, or has reason to believe that the minerals may not be from scrap or recycled sources then the company must undertake ‘due diligence’ on the source and chain of custody of its conflict minerals and file a Conflict Minerals Report.

The company is required to make publicly available any determinations made or Conflict Minerals Reports on its Internet website.

3. OUR COMMITMENT

AnTech supports the Act in its efforts to reduce the impact associated with the mining of these minerals in the DRC and its adjoining countries. AnTech endeavours to comply with the legislative and regulatory requirements in ensuring, to the best of the company's ability, that a conflict-free supply chain is maintained.

In support of this initiative, AnTech has developed this Company Policy, to be implemented alongside IP28 – Conflict Minerals Supplier Auditing.

As AnTech sells and distributes products containing components manufactured by others, the company doesn't always have direct access to information regarding where suppliers procure their own raw materials. AnTech is, however, working with its suppliers to obtain any relevant information regarding this matter. This requires the company's suppliers to:

- Conduct a reasonable 'Country of Origin' inquiry
- Undertake 'due diligence' on the source and chain of custody of their conflict minerals and file a Conflict Mineral Report
- Where possible, purchase conflict-free materials and products

AnTech will maintain an updated version of the completed Conflict Minerals Reporting Template which can be made available upon request.

4. REVIEW AND COMMUNICATION

It is the responsibility of the QHSE Manager to ensure this document is reviewed annually or as required following incidents, changes in legislation, procedures or processes.