

Hadleigh Castings Limited

Title	CONFLICT MINERALS POLICY
Date of Issue	March 2016
Revision No	1
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1. INTRODUCTION

The UK Government is committed to supporting British companies overseas, including through securing a fair and transparent business environment. As the UN Guiding Principles on Business and Human Rights make clear, all companies have an important role to play in respecting human rights through responsible operations and respecting all relevant national and international laws and standards.

Our aim is to ensure that businesses within our supply chain do not contribute to conflict, and that companies understand their role in improving oversight and management of the sector.

2.0 SCOPE AND PURPOSE

2.1 What are 'conflict minerals'?

Conflict minerals are minerals mined in conditions of armed conflict and human rights abuses, and which are sold or traded by armed groups. This has for some years been a particular problem in the DRC.

Conflict minerals in the eastern DRC are generally defined (including in US legislation and the OECD due diligence guidance for responsible mineral supply chains) as Cassiterite (Tin), Coltan (Tantalum), Wolframite (Tungsten) and Gold, or derivatives of these minerals. These minerals are generally referred to as the '3TG's'

Mineral	Description	Major uses
Cassiterite	Ore from which tin is extracted	Plating and solders for joining pipes and electronic circuits
Columbite-tantalite	Ore from which tantalum is extracted	Electrical components (including those used in mobile phones, computers, videogame consoles), aircraft and surgical components
Gold	Rare metal found in a native (pure) form and obtained as a by-product of other mining operations	Jewellery, electronic, communications and aerospace equipment
Wolframite	Ore from which tungsten is extracted	Metal wires, electrodes and contacts in lighting, electronic, electrical, heating and welding applications

Hadleigh Castings Ltd (HCL) are committed to ensuring the health, safety and protection of people who come into contact with our products and business, and we require high social, environmental and human rights standards among our suppliers. Managing our obligations in relation to Conflict Minerals is a part of this corporate responsibility.

2.2 HCL's commitments

We are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries. Therefore we are committed to:

- not buying products and materials containing Conflict Minerals directly from Conflict Mines
- asking our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to HCL do not originate from Conflict Mines

2.3 Who mines the conflict minerals?

In DRC various non-state armed groups, such as the Democratic Forces for the Liberation of Rwanda (FDLR), but also rogue brigades within the Armed Forces of the Democratic Republic of Congo (FARDC) – the Congolese national army – are reportedly involved in the production and trade of conflict minerals. While several industrial gold mining companies are moving from exploration to production of gold in northern and eastern DRC, and several mining companies are producing gold in the DRC's adjoining countries, artisanal (small-scale, independent) mining remains an active mode of production in the conflict-affected parts of eastern DRC.

An artisanal miner is a subsistence miner, not officially employed by a mining company, but working independently, mining or panning for gold using their own resources. 80-90% of mineral production in the DRC is being undertaken by between 1 and 2 million artisanal miners in the DRC who, in turn, support a larger community of 4 -12 million people. (Source: World Bank Promines Project Appraisal)

3. GENERAL

HCL deplores the violence in the DRC and adjoining countries and is committed to supporting responsible sourcing of conflict minerals from the region. Accordingly, HCL has adopted a conflict minerals policy, as part of *HCL's Supply Chain Policy*. HCL expects its suppliers to adopt a similar policy and to meet the expectations set out below.

3.1 HCL's Expectations for Suppliers.

- **Supply "DRC Conflict Free" materials.** Under HCL's conflict mineral's policy, suppliers are expected to supply materials to HCL that are "DRC conflict free," which means either: 1) any 3TGs necessary to the functionality or production of supplied materials must not directly or indirectly fund armed conflict in the DRC or adjoining countries, or 2) any 3TGs must be from recycled or scrap sources.*
- **Adopt conflict minerals policies.** Suppliers to HCL must adopt a policy regarding conflict minerals consistent with HCL's policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps.
- HCL encourages its suppliers to responsibly source 3TGs from the DRC and adjoining countries through smelters and refiners validated as DRC Conflict Free through the CFS or similar programs.
- Link to CFSI website: <http://www.conflictreesourcing.org/>