

Doncasters Policy Against Use of Conflict Minerals**1. Introduction and Policy Regarding Conflict Minerals**

- 1.1 Doncasters Group Limited's Code of Ethics, dated June 2012 (the "Code of Ethics"), defines the company's overall principles and commitment towards legal compliance, ethical conduct, human rights, anti-corruption work and environmental protection. These high expectations extend to Doncasters partners, subcontractors and suppliers, whom we encourage to strive beyond merely fulfilling legal compliance. This Policy provides further clarification to the principles of the Code of Ethics with respect to Conflict Minerals (as defined in 2.1).
- 1.2 Doncasters policy regarding Conflict Minerals is as follows: All raw materials, products, parts and components purchased by Doncasters containing Conflict Minerals shall be "conflict free" (which term is described in more detail in 2.2).

2. Background

- 2.1 In July 2010, President Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. Although the focus of the Dodd-Frank Act is financial market regulatory reform, Section 1502 of the Dodd-Frank Act requires publicly-traded companies that purchase or use Conflict Minerals, or purchase products containing Conflict Minerals, that are necessary to the manufacturing of a product to begin tracking as of 1 January 2013 whether such Conflict Minerals originated from the Democratic Republic of Congo ("DRC") or any countries adjoining the DRC (which countries are Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia) (the DRC together with such adjoining countries, collectively, the "DRC Region"). As used in the Dodd Frank Act and in the final rules issued by the U.S. Securities and Exchange Commission ("SEC") in August 2012 implementing Section 1502 of the Dodd-Frank Act (the "SEC Conflict Minerals Rules"), the term "Conflict Minerals" includes, among other minerals and/or their derivatives, tantalum, tin, tungsten and gold.
- 2.2 The SEC Conflict Minerals Rules also impose reporting requirements upon publicly-traded companies whose products contain metals derived from Conflict Minerals. Specifically, the Dodd-Frank Act and the SEC Conflict Minerals Rules require that publicly-traded companies report annually to the SEC on: (a) their worldwide use of Conflict Minerals in products they manufacture or contract to manufacture; and (b) the actions of their supply chains in identifying the use of Conflict Minerals, identifying the country of origin for any Conflict Minerals so used, and, if any such Conflict Minerals originate/originated from the DRC Region, determining whether such Conflict Minerals from the DRC Region are "conflict free." The term "conflict free" means that the Conflict Minerals do not directly or indirectly finance armed groups through mining or mineral trading in the DRC Region.
- 2.3 Please note that the requirements of the SEC Conflict Mineral Rules set forth in 2.1 and 2.2 (a) apply to both U.S. and non-U.S. suppliers, (b) require reporting by companies that are not SEC-registrants if they are determined to be members of the manufacturing supply chain for an SEC-registered company, and (c) require publicly-traded companies in the U.S. to report on Conflict Minerals in their products that originate in the DRC or the other nine countries in the DRC Region on an annual basis with effect from 1 January 2013. Please also note that annual submission to the SEC may require an independent third-party audit, and, therefore, proper documentation of information related to our supply chain is critical for both Doncasters and Doncasters' customers.

3. Doncasters Activities with both Customers and Suppliers

- 3.1 Neither Doncasters Group Limited nor any of the Doncasters businesses is an SEC-registered company. That being said, Doncasters is a major supplier to several major SEC-registered companies in the U.S., whose product portfolio includes certain products manufactured with material containing Conflict Minerals. As a result, Doncasters is required to make declarations regarding the origin of the Conflict Minerals in such products to certain of its customers. (For further explanation, see 2.3.)
- 3.2 Furthermore, a number of Doncasters' customers have adopted a policy that all products supplied to them by Doncasters (and their other suppliers) must be declared "conflict free."
- 3.3 Doncasters complies with applicable laws and commits to drive best industry practice. We will use the standardized EICC-GeSI Conflict Minerals Reporting Template to map and to monitor our suppliers' commitment and activities relative to this Policy. (For a link to the current version of the template, see 4.2.) Additional details shall be requested from suppliers to map and monitor such commitment and activities as needed.
- 3.4 We will incorporate the principles of this Policy into our contractual arrangements with our suppliers and we will work with our suppliers to increase transparency in the supply chain. We aim to create awareness and build capacity within our supplier base through regular supplier meetings and other means. We will communicate the principles of this Policy to our suppliers and request them to set similar policies for their supply chain.
- 3.5 Doncasters will rely on industry initiatives, such as the Conflict Free Smelter Program (CFS), to validate that the metals used in our products are not contributing to conflict and come from sustainable sources. As smelter lists are available and updated, suppliers will be requested to procure materials only through validated smelters (which supply material containing "conflict free" Conflict Minerals). Doncasters supports in-region sourcing schemes (e.g. iTSCi), which are essential for the success of CFS, through industry initiatives and related partnerships.

4. Doncasters Supplier Requirements for "Conflict Free" Conflict Minerals

- 4.1 Doncasters policy requires that our suppliers who manufacture components, parts, or products and/or who supply materials containing the Conflict Minerals tin, tantalum, tungsten, and/or gold must commit to sourcing such materials, components, parts, or products from environmentally and socially responsible sources only. Materials, components, parts, or products which, either directly or indirectly, contribute to conflict are unacceptable. Thus, suppliers shall only supply to Doncasters materials, products, parts and components containing Conflict Minerals that are entirely "conflict free."
- 4.2 Suppliers shall define, implement and communicate to sub-suppliers their own policy, outlining their commitment to responsible sourcing of materials (including, the purchase of "conflict free" materials, products, parts and components), legal compliance and measures for implementation. Suppliers shall work with sub-suppliers to ensure traceability of Conflict Minerals in their supply chains to at least to smelter level, e.g. by using the EICC-GeSI Conflict Minerals Reporting Template. (A copy of the template can be downloaded at: Download the latest version of the EICC-GeSI Conflict Minerals Reporting Template at <http://www.conflictreesmelter.org/documents/EICCGeSIDDtemplate.xlsx> (registration required).) Doncasters reserves the right to request further evidence of a supplier's supply chain down to mine level when necessary. Once mechanisms are available, suppliers shall ensure that purchased metals originate from smelters validated as being "conflict free." (For

further explanation, see 3.5.) Traceability data shall be maintained and recorded by suppliers for 5 years and provided to Doncasters upon request.

- 4.3 Suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

5. Assessment of Supply Chain and Responding to Non-Conformance with this Policy

- 5.1 Doncasters will collect material composition information for all our products in order to allow us to identify suppliers that use Conflict Minerals (namely, tin, tantalum, tungsten and/or gold) in their material, components, parts and/or products and to determine if such Conflict Minerals so used are “conflict free.” Material composition data along with information gathered from suppliers (e.g. with the EICC-GeSI Conflict Minerals Reporting Template), industry initiatives (e.g. CFS), and other available sources will be used to assess risks of non-compliance with this Policy.

- 5.2 Doncasters approach is to establish long-term relationships with suppliers, always seek sustainable solutions, and work with suppliers to drive improvements. If we identify a reasonable risk that a supplier is violating our commitments set forth in this Policy, we will require them to commit to and implement a corrective action plan within a reasonable timeline. Doncasters will follow up on the effectiveness of corrective actions and will conduct on-site assessments as necessary. Continued non-conformance and refusal to address issues of concern by a supplier will require appropriate action (including, without limitation, termination of business relationship).

6. Grievance mechanism & Reporting

- 6.1 This Policy will be reviewed regularly and updated as needed.

- 6.2 Concerns and violations of this Policy can be reported to Doncasters Board of Directors or Doncasters Executive Leadership Team through our official grievance channels:

6.2.1 In the U.K. (use for Europe), via: ExpoLink (Doncasters 24 hour / 7 day toll-free grievance hotline):

0800 374199 (UK)

6.2.2 In the U.S. and Mexico, via ExpoLink (Doncasters 24 hour / 7 day toll-free grievance hotline):

+1 (877) 533-5310