

First/current publication: March 2022

Version: 1

Document type: Policy

Scope: Global



DONCASTERS

GLOBAL CONFLICT MINERALS POLICY

POLICY NAME
Global Conflict Minerals Policy
PURPOSE
Doncasters together with its subsidiaries, is committed to corporate responsibility and to respecting human rights in its own operations, and in its global supply chain.
OBJECTIVES
The objectives of this Policy are:
<ol style="list-style-type: none"> 1. To ensure that all raw materials, products, parts, and components purchased by Doncasters containing Conflict Minerals shall be Conflict Free. 2. To show Doncasters' commitment and its expectations for its product suppliers regarding Conflict Minerals.
AUDIENCE
The policy applies to all companies within the Doncasters Group, including all operating companies under the operational control of Alloy Topco Limited.
In the following document a Doncasters Group entity is referred to as "Doncasters" or "the Company" interchangeably.
Doncasters is committed to ensuring that its stakeholders, including but not limited to its suppliers, consultants, and advisors, uphold the principles set out in this policy and adopt similar policies within their operations.
INCLUDED IN THIS POLICY IS
<ol style="list-style-type: none"> 1. Definitions 2. Doncasters Activities with Customers and Suppliers 3. Doncasters Supplier Requirements for 'Conflict Free' Conflict Minerals 4. Consequences of Supplier Non-Compliance 5. Reporting Mechanisms
CONFIDENTIALITY STATUS
Public
LOCAL ADAPTATION AUTHORISATION
No
DOCUMENT OWNER
Legal, Compliance & Risk
DOCUMENT REVIEWER
Executive
DOCUMENT APPROVER
Board of Directors

INTRODUCTION

“Doncasters fully understands the importance of this issue to its customers and is committed to the responsible sourcing of minerals throughout its global supply chain and supports the aims and objectives of the US legislation on the supply of conflict minerals. We encourage all of our suppliers to likewise support these efforts”

Mike Quinn, CEO

Profits from mining around the world may be being used to fund armed conflict, as many mines are under the control of armed groups. The most widely cited incidents of Conflict Minerals are in the Democratic Republic of the Congo (DRC) and surrounding countries of Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (together the DRC Region).

In 2012, the US Securities & Exchange Commission (SEC) issued a “Conflict Minerals” rule, as mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act 2010, which brings greater supply chain transparency to the use of Conflict Minerals originating from the DRC Region. The SEC’s Conflict Minerals rule requires SEC registrants who manufacture products containing Conflict Minerals that are necessary to such products’ functionality or production to disclose the origin and status of the conflict minerals.

The requirements of the SEC Conflict Minerals rules:

- a)** apply to both US and non-US 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;
- c)** require publicly traded companies in the US to report on Conflict Minerals in their products that originate in the DRC Region on an annual basis.

It is recognised that a Conflict Free claim does not guarantee that the human rights of workers are respected and therefore this Policy forms part of a broader approach to socially responsible supply chains.

DEFINITIONS	
DRC Conflict Free	Conflict Free means that the Conflict Minerals do not directly or indirectly finance armed groups through mining or mineral trading in the DRC Region.
Conflict Minerals	Conflict Minerals includes, among other minerals and/or their derivatives tantalum, tin, tungsten' and gold regardless of their country of origin
employee	'employee' shall mean and include any person on the active payroll of the Company including managers and workers, those on deputation, contract, temporary, part time, apprentices, trainees or working as consultants.
DONCASTERS ACTIVITIES WITH CUSTOMERS AND SUPPLIERS	
<p>Doncasters is not an SEC registered company. However, Doncasters is a supplier to several SEC registered companies, whose product portfolio includes products manufactured with material containing Conflict Minerals. Doncasters is therefore required to make declarations regarding the origin of the Conflict Minerals as part of the manufacturing supply chain.</p> <p>Some of Doncasters' customers have adopted a policy that requires Doncasters to declare that all products supplied to them are Conflict Free.</p> <p>Doncasters complies with applicable laws and commits to drive best industry practice. Doncasters will:</p> <ul style="list-style-type: none"> • use the standardised EICC-GeSI Conflict Minerals Reporting Template to map and monitor our supplier's commitment to this Policy. • incorporate this Policy into our contractual arrangements with our suppliers and will work with suppliers to increase transparency in the supply chain. • communicate this Policy to our suppliers and request that they implement similar policies for their supply chain. • rely on industry initiatives such as the Conflict Free Smelter Program to validate that the metals used in our products are not contributing to conflict and are sustainable sourced. Suppliers will be requested to procure materials only through validated smelters. 	
DONCASTERS SUPPLIER REQUIREMENTS FOR "CONFLICT FREE" CONFLICT MINERALS	
<p>Doncasters has the following expectations of its suppliers:</p> <ul style="list-style-type: none"> • suppliers should not include in any products sold to Doncasters any Conflict Minerals that are not DRC Region Conflict Free. • suppliers should develop Conflict Minerals policies, due diligence frameworks and management systems that are designed to prevent Conflict Minerals that are not DRC Region Conflict Free from being included in the products sold to Doncasters. • suppliers are expected to source Conflict Minerals only from sources that are DRC Region Conflict Free. <p>In doing so, suppliers will be expected to:</p>	

- implement and communicate to their personnel and suppliers, policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same;
- put in place procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers;
- use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Region Conflict Free, and require their direct and indirect suppliers to do the same;
- advise Doncasters of any determination that the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to Doncasters are not DRC Region Conflict Free;
- maintain reviewable business records supporting the source of Conflict Minerals and from time to time, at Doncasters request, provide Doncasters with information concerning the origin of Conflict Minerals including in products sold to Doncasters.

Suppliers are encouraged to support industry efforts to enhance traceability and responsibly practices in Conflict Minerals supply chains.

CONSEQUENCES OF SUPPLIER NON-COMPLIANCE

Doncasters evaluates its relationships with our suppliers on an ongoing basis and Doncasters reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Doncasters reserves the right to request additional documentation from our suppliers regarding the origin of any Conflict Minerals, including in any products sold to Doncasters.

If Doncasters determines that a supplier’s efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Doncasters reserves the right to take appropriate actions, up to and including, termination of the business relationship.

REPORTING MECHANISMS

Reporting to Management

Our employees, suppliers and other parties can report concerns and alleged breaches of this Policy to their line manager (if an employee); their Doncasters Business Partner/contact; Group Legal or any member of the Executive or Board.

Report through Speak Up

Employees and other stakeholders can also report breaches of this Policy via the Speak Up service. The Speak Up service is run by a company called Navex and is an external, independent reporting service designed for employees and others to report anonymously any breach of Law, our Code of Conduct, Corporate Values and related policies or directives, including this one, while complying with local regulations.

Details of the contact details can be found in our Code of Conduct, on posters around each site, on the Employee App and on SharePoint.

REPORT ONLINE

www.doncasters.ethicspoint.com

REPORT BY PHONE

From the UK:

Call: 0800 890 011

(when prompted, dial: 833 537 0829)

From the USA:

Call: 833-537-0829

From Germany:

Call: 0800 225 5288

(when prompted, dial: 833 537 0829)

From India:

Call: 000 800 050 3406

From Mexico:

For outside calls, dial your local access code followed by 800-288-2872.

Por Cobrar Spanish: 800-112-2020

(when prompted, dial: 833 537 0829)

From China:

For an outside line, dial the direct access number for your location:

China (Southern): 10-811

China (Northern): 108-888

(when prompted, dial: 833 537 0829)