

## **Conflict Minerals Policy**

Broder Metals Group Ltd has adopted a responsible procurement policy regarding the purchase of materials for resale which may contain identified Conflict Minerals (tantalum, tin, tungsten and gold).

Broder Metals Group Ltd is also aware of the obligations under section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act 2010 (Dodd-Frank) even though we have no statutory reporting requirement to the U.S. Securities & Exchange Commission, and the regulation passed by the EU in May 2017 to stop:

- conflict minerals and metals from being exported to the EU
- global and EU smelters and refiners from using conflict minerals
- mine workers from being abused

Broder Metals Group Ltd supports the goal to identify and ultimately discourage the use of minerals and their derivatives mined in conflict zones, especially the Democratic Republic of the Congo (DRC) and adjacent countries.

Accordingly, we will not knowingly purchase nor use minerals or their derivatives sourced from conflict mines in the Democratic Republic of Congo or adjacent countries, unless unintentionally melted as part of the production cycle incorporating recycled materials, scrap, etc., as allowed under the EU Conflict Minerals & Metals Regime

Broder Metals Group Ltd will maintain due diligence processes to achieve compliance with this commitment and will require relevant suppliers to similarly comply.

M Andrews

Director

Re-approved 2 January 2018