

3TG

EC DECLARATION OF CONFORMITY

According to the 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4), profits from conflict minerals have supported conflict, human rights violations, and labour and environmental abuses. Companies that use these minerals in the design and manufacture of their products and components are concerned about these abuses, and are taking action to avoid contributing to conflict in any way, while encouraging responsible sourcing from the region.

The Organisation for Economic Co-operation and Development (OECD) have provided “Due Diligence” guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Due Diligence is a process that companies or individuals shall undertake to ensure that the extraction and trade of mineral ores collectively known as “3TG” containing Tin (Sn), Tantalum (Ta), Tungsten (W) and Gold (Au) support peace and development, not conflict. Due Diligence includes a number of steps put in place with strong systems of control over the supply chain, passing vital information to buyers and to the governments and regional institutions that regulate the mineral trade, assess conflict conditions at mine sites, transportation routes and points where minerals are traded. These steps facilitate the sourcing from areas and suppliers that do not contribute to conflict, and the reporting of Due Diligence. The guidance for OECD Due Diligence is available at:

<https://mneguidelines.oecd.org/mining.htm>

Due Diligence requires businesses to inform supply chain participants about risks identified during smelter / refinery audit and to disengage from suppliers associated with any smelters / refiners that may be contributing to abuse.

We declare that we have strong company management systems and to the best of our knowledge, that our supply chain participants do not contribute to abuse with the exception of the products listed in the attached table. We will continue to audit 3TG supply chains, mitigate risk, monitor and track progress and immediately inform our customers if and when a smelter / refinery risk is no longer acceptable and the source of supply has been disengaged.



Stephen Merrie
Product and Engineering Compliance Director
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Risks:

Articles	3TG	Components with 3TG	Smelter / Refinery	Date of Audit	Risk Identified	Risk Acceptable
Valves, Strainers. Adaptors, Connectors	Sn	Brass	Various	2020-12-11	Recycling	Yes
Eaton products	Sn, Au	Various	Various	2019-12-31	In-sufficient information to conclusively determine the countries of origin or chain of custody of Minerals.	Yes
Henkel products	Sn, W, Au	Various	Various	2020-08-31	Certified Smelters are allowed to source from legitimate sources in covered countries.	Yes
IMI Norgren products	Sn, Ta, W, Au	Various	Various	2020-03-16	Investigations ongoing. Sn sourced from covered countries.	Yes

Disengaged suppliers:

None.

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