



CONFLICT MINERALS POLICY

KINETROL LTD

PHONE NUMBER:
+44 (0) 1252 733838

WEBSITE:
www.kinetrol.com/policies

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Introduction

Kinetrol Ltd is committed to ethical sourcing and responsible supply chain practices. We recognize that the extraction and trade of certain minerals—including tantalum, tin, tungsten, gold (3TG), cobalt, and diamonds—can contribute to human rights abuses, environmental harm, and armed conflict. This policy outlines our commitment to compliance with **Section 1502 of the Dodd-Frank Act, EU Regulation (EU) 2017/821**, and the **Kimberley Process for conflict-free diamonds**.

Policy Statement

Kinetrol Ltd is dedicated to ensuring that our supply chain does not contribute to conflict, forced labour, or other human rights violations. We commit to:

- **Due Diligence:** Conducting a reasonable country of origin inquiry (RCOI) and implementing OECD-aligned due diligence measures to trace the source of minerals in our supply chain where high risks are identified.
- **Supplier Engagement:** Requiring suppliers to provide Conflict Minerals Reporting Templates (CMRT) upon request and demonstrate responsible sourcing practices for 3TG, cobalt, and diamonds as laid out in our code of conduct.
- **Transparency & Reporting:** Publicly disclosing our due diligence efforts in accordance with global regulatory requirements as part of our annual reporting.
- **Risk Mitigation:** Taking corrective action if suppliers are found to source minerals from high-risk areas without proper oversight.

Compliance Framework

To comply with Dodd-Frank, EU regulations, and the Kimberley Process, Kinetrol Ltd will:

1. Identify & Assess Risks: Work with suppliers to determine the origin of 3TG, cobalt, and diamonds, and assess supply chain risks.
2. Implement Controls: Require suppliers to adhere to responsible sourcing standards and provide documentation verifying compliance.
3. Audit & Monitor: Conduct periodic reviews and audits to ensure adherence to this and other Kinetrol policies.
4. Report Findings: Submit required disclosures to regulatory bodies and stakeholders when required to do so.

Supplier Expectations

Kinetrol Ltd expects all suppliers to:

- Source 3TG minerals, cobalt, and diamonds from conflict-free smelters, refiners, and mines.
- Provide full traceability of mineral sources upon request.
- Cooperate with audits and due diligence inquiries.
- Notify Kinetrol Ltd of any changes in sourcing practices.

Conclusion

Kinetrol Ltd is committed to ethical sourcing and compliance with global responsible minerals regulations. We will continue refining our due diligence processes and collaborate with industry partners to promote responsible mineral sourcing.