



Conflict Free Material Policy

It is the policy of ICD Europe Ltd that:

1. As a responsible participant in the metals industry and as a member of the Tantalum-Niobium International Study Centre (TIC) we are aware of the seriousness of the humanitarian crisis in the Democratic Republic of Congo (DRC) and also adjoining countries.
2. In accordance with Section 1502 of the U.S. Dodd Frank law governing conflict minerals (Tantalum, Tungsten) ICD Europe Ltd have taken several steps to identify and assess the risks in our supply chain and are making continued efforts to verify that all minerals are from conflict free areas.
3. We are fully committed to avoiding the use of conflict materials, which directly or indirectly finance or benefit the illegal trade in such areas.
4. As a result of this we have implemented the following policies and procedures.
5. All our suppliers must support and follow OECD Due Diligence Guidelines for Responsible supply chains as well as conforming to strict EICC rules.
6. To prevent any conflict materials being unknowingly purchased by ICD Europe Ltd we instruct all our suppliers to issue a conflict free policy with signatory declaration of conflict free material in the supply chain, a statement disclosing the percentage of conflict materials that are dealt with, and a confirmation of material origin with every delivery.
7. These procedures are stipulated in our contractual terms or purchase.

These policies supplement your terms of employment but are not of contractual effect. Their purpose is to explain the Company's current policies and procedures but they may be subject to change without notice if changes are considered appropriate by the Company or if there are changes in relevant legislation.

Responsibility for authorizing, implementing, communicating, and improving this policy is:

A handwritten signature in black ink, appearing to read 'Wayne Hawkes', is written over a light blue horizontal line.

Wayne Hawkes

Managing Director

Next Review Due: July 2021