

FLANN MICROWAVE LTD. RESPONSIBLE MINERALS SOURCING POLICY

Flann Microwave Ltd understands that certain minerals predominantly originate from Conflict Affected and High-Risk Areas (CAHRA)¹, including the Democratic Republic of Congo (DRC) and its adjoining countries. In these areas there are heightened concerns that proceeds from minerals could be used to contribute to armed conflict or human rights abuses. In particular the proceeds from the processing of the minerals tin, tungsten, tantalum, and gold (3TG Minerals) could contribute to armed conflict in DRC and its adjoining countries and these have become commonly referred to as “conflict minerals.”

In 2012 the US Securities and Exchange Commission (SEC) approved a conflict mineral rule as mandated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. In 2021 The European Union (EU) Conflict Minerals Regulation introduced new due diligence and reporting requirements to EU importers, and any company trading minerals from high-risk regions.

Although Flann Microwave Ltd, as a privately owned UK company and a downstream user of metals and electronic components, are not bound by Dodd-Frank, and unlikely to have significant responsibility under EU regulation, we are committed to supporting the UK Government and international efforts to ensure the mineral wealth of the DRC is not used to support conflict or human rights abuses.

Consistent with our company values, Flann Microwave’s goal is to avoid sourcing minerals in a way that contributes to armed conflict or human rights abuses. Flann’s goal is also to continue to support the communities in those areas that depend on the mining industry through the sustainable sourcing of minerals in accordance with this policy.

We are adopting this policy and have designed our processes and due diligence practices in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas (OECD Due Diligence Guidance) in order to address responsible mineral sourcing.

Ian Burnage
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