

Conflict Minerals and Conflict Minerals Procurement Policy

As a socially responsible company, Labcold Ltd has concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights and comply with applicable laws and regulations. "Conflict Minerals" is no exception.

Labcold Ltd recognises that metallic materials are used in the production of some of our technical products. We support the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC) and its nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda); the major driver of this violence being the natural abundance of the minerals Tin (Sn), Tungsten (W), Tantalum (Ta) and Gold (Au), referred to as "conflict minerals" or "3TG".

On the 22nd August, 2012, The United States Securities and Exchange Commission (SEC) passed Article No. 1502 of the "Dodd-Frank Wall Street Reform and Consumer Protection Act", with regard to "Conflict minerals" procurement, which aims to ensure conflict-free sourcing of minerals and metals. Under this rule, publicly traded companies must report annually to the SEC the presence of any "conflict minerals" originating from Central Africa in either the products they manufacture or contract to manufacture, or use in the production process.

The European commission has passed the Conflict Minerals Regulation ((EU) 2017/821), its key requirements came into force on 1 January 2021 which imposes obligations on importers of 3TG minerals for free circulation into the EU and smelters or refiners to carry out and report on the source of such 3TG minerals to ensure they are imported from responsible and conflict-free sources only.

Although neither of the Dodd Frank Act or the EU regulations directly apply to Labcold Ltd, Labcold is concerned to ensure that its suppliers source their raw materials from compliant sources, but Labcold does not wish to prohibit the mining and trade of 3TG from legitimate sources.

Expectations for Suppliers

In support of this policy, our suppliers are expected to adopt policies and management systems that ensure products supplied to Labcold Ltd are "DRC Conflict-Free". Suppliers must provide documentation in evidence of this through the "Supplier Evaluation Form – LSF0114". This requirement extends to their suppliers, who must also adopt similar policies and systems.

Under the definition of "DRC Conflict-Free," any products supplied to Labcold Ltd containing 3TG minerals, or having application/coating of these minerals must:

- Originate outside the DRC
- Come from scrap or recycled sources
- Be supplied by smelters that have been validated by an independent private sector party to be conflict-free*.

*Certified conflict-free smelters are validated as compliant to the EICC (Electronic Industry Citizenship Coalition) conflict free smelter (CFS) protocol using the CFS Compliant Smelter List, or by reference to the EU maintained list of global responsible Smelters and refiners. Through the CFS protocol, smelters are audited globally; the list of compliant smelters and refiners is posted at www.conflictreesmelter.org.

As part of Labcold Ltd Conflict minerals due diligence program, Labcold will not approve any supplier that is not "DRC Conflict-Free".

Signed by;



Suzanne Clubley – Director
Labcold Ltd

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