



Conflict Minerals Policy Statement

The Dodd-Frank Wall Street Reform and Consumer Protection Act

In 2010, The United States Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502 of the act imposes a supplier chain reporting requirement to promote transparency and consumer awareness regarding the use of conflict minerals.

Section 1502 identifies “Conflict Minerals” as financing armed conflict in the eastern part of the Democratic Republic of Congo (DRC) and adjoining countries that have a recognised border with the DRC. Conflict minerals are defined as being Gold (Au), Tin (Sn), Tungsten (W), Tantalum (Ta) and the derivatives of Cassiterite, Columbite-Tantalite and Wolframite.

If present, the rule requires manufacturers who file certain reports with the U.S. Securities and Exchange Commission (SEC) to disclose whether products they manufacture or contract out to be manufactured contain “conflict minerals” that are “necessary to the functionality or production” of these products.

Corporate Acknowledgement

Mowden Controls Ltd abhor the ongoing violence and human rights violations within the DRC region, and hereby fully support the continuing efforts to eradicate the region of such violence and atrocities, and to end the human suffering and environmental impacts associated with mining in the DRC region.

Corporate Responsibility

Mowden Controls Ltd is committed to sourcing responsibly through its supply chain. Mowden Controls Ltd is not legally obligated to meet the reporting requirements of the act as we are a privately owned company. However, in order to support our customers, some of which are public limited companies and therefore subject to the reporting requirements, Mowden Controls Ltd have established a Conflict Minerals Program to ensure that we meet with the reporting requirements.

As part of our corporate responsibility and ongoing due diligence, Mowden Controls Ltd will adopt the following principles, and incorporate them in to our quality management system. These are as follows: -

- Suppliers who provide components, materials or products containing any of the affected minerals, are required to submit periodic reports using the Conflict Minerals Reporting Template provided by CFSI conflict-free smelter program;
- Existing and potential new suppliers will be required to provide evidence on how they implement due diligence measures to ensure that their own supply chain remain free from the use of conflict minerals;
- Mowden Controls Ltd will Potential new suppliers will be required to provide evidence on how they implement due diligence measures to ensure that their own supply chain remain free from the use of conflict minerals;
- Mowden Controls Ltd will support customer by providing compliance information upon request;

To date, all Mowden Controls Ltd suppliers have favourably responded to our ongoing request for information, and have demonstrated to the best of our knowledge, that no “conflict minerals” sourced from the DRC region have been used in the manufacturing of Mowden Controls Ltd and/or customer products.

Approved By:

27/06/17

Stephen L. Williams, Managing Director

Date Approved

REVISION STATUS HISTORY			
DATE OF ISSUE	ISSUE NO	DESCRIPTION OF AMENDMENT	APPROVED BY
27/06/17	3	Added the requirement to assess potential new suppliers for conflict mineral compliance and that one of our quality objectives is to ensure that compiled data is shared with customers upon request	SLW
10/09/16	2	Added the requirement to compile CFSI / CMRT data received from our supply chain, and to add this data to our CFSI template	SLW
08/09/15	1	Conflict Minerals policy reviewed and approved for issue and addition to the companies quality management system	SLW