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		Release	SP DM electronic

Procurement of Components in respect to Minerals from Mines in “Conflict Regions”

The following are statements describing May & Scofield Ltd policy on procurement of electronic components and other components which may contain minerals which fall into the US Securities and Exchange Commission (SEC) rules on section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act implemented 22nd August 2012 and adoption of EU Conflict Mineral Regulation 2017/821

“**Conflict Minerals**” currently include **gold (Au); tin (Sn), tantalum (Ta) and tungsten (W)**, the derivatives of cassiterite, columbite-tantalite, and wolframite respectively. These conflict minerals are referred to as “**3TG**”.

The term “**conflict minerals**” applies to all 3TG minerals, whether or not they originate in the Covered Countries.

“**Covered Countries**” Democratic Republic of Congo (DRC), Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

May & Scofield (M & S) Policy Statements

- M & S only manufacture bespoke electronic assemblies by population of bespoke PCBs using OEM proprietary components, sourced from approved global distribution supply chain and as such have no direct sourcing of 3TG from smelters or their material mines.
- M & S do not file reports to the SEC and have no legislative obligation to comply with the conflict minerals requirement of the Dodd-Frank Act as a UK based company.
- M & S is not a direct importer of raw material into the EU therefore is not required to conduct due diligence or submit a submission in respect to the EU 2017/821 Regulation.
- However, M & S acknowledges the importance of the issue and will support its customers’ requests for CMRT submissions at a company level scope.
In this respect M & S conducts 3TG due diligence but restricted to receipt of CMRT data from its direct supplies as part of its with its suppliers Supplier Requirements Manual BMWI-006 in respect to sustainable business practices and transparency of material.
M & S does not have the resources or influence to conduct CMRT audits of its supply chain.
- Where possible in future product designs, components containing conflict minerals sourced outside of the conflict regions will be selected over those with conflict minerals sourced within the conflict region.

Garry James

Gary James M.D.

Signed on and behalf of May & Scofield Ltd.

TITLE	Issue	Date	Release	Document Number
May & Scofield Ltd Policy on Procurement of components containing “Conflict Minerals”	a	10/04/12	Draft	QF-0045
	1	26/04/13	First	
	2	05/01/14	2 year review	
	3	10/08/17	2017 Review	
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	5	30-09-21	2021 review	