HAGUE FASTENERS LIMITED

Conflict Minerals and Responsible Sourcing Policy

Disclosure | Tin, tantalum, tungsten and gold (3TG), and extended minerals

DOCUMENT REF.	ISSUE	ISSUE DATE	REVIEW	OWNER
HF-CMD	6	03/11/2026	Annually	Managing Director

HAGUE FASTENERS LIMITED will **not knowingly procure materials that contribute to conflict or human rights abuses**. We take a risk-based approach to tin, tantalum, tungsten and gold (3TG), and to responsible sourcing across our wider supply chain.

Downstream

We buy commercially available steel and alloys through stockholders and distributors, not from mines or smelters.

Traceable to mill

Mill certification gives the country of melt and producing mill for every batch.

Due diligence

Supplier conflict minerals policies and declarations, and a reasonable country of origin inquiry, aligned with RMI and OECD guidance.

01 Frameworks

We acknowledge Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act, Regulation (EU) 2017/821 and the corresponding expectations in the United Kingdom. These align with the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**, which forms the basis of our approach.

02 Our position in the supply chain

- We do not source minerals directly from mines, smelters or refiners.
- We buy commercially available steel and alloy materials through stockholders, importers and distributors.
- We operate within global supply chains involving primary production, secondary processing and recycled content.

This is consistent with the definition of a downstream company in the OECD Guidance and industry frameworks.

03 Traceability and due diligence

Material origin	Mill certification, issued at the point of steel production, gives the country of melt, the producing mill, and chemical and mechanical properties to recognised standards. This is the recognised, auditable point of origin for steel products in our sector. We do not maintain traceability beyond this point.
Supplier declarations	Our supplier approval questionnaire asks each steel and material supplier for its conflict minerals policy or declaration, and we accept its CMRT where provided. The evidence is recorded on our Key Suppliers Register and reviewed at supplier approval and re-evaluation. Suppliers that only process material we provide, such as heat treaters and platers, are outside this check.

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Risk assessment	We assess risk through a reasonable country of origin inquiry, aligned with the Responsible Minerals Initiative (RMI) and the OECD Guidance.
Supplier expectations	Suppliers must maintain equivalent due diligence and provide declarations supporting transparency in their own supply chains (Supplier Code of Conduct, HF-SCC).
Monitoring	The share of relevant suppliers with conflict minerals evidence is a quality objective, reviewed at Management Review.

04 Scope of our CMRT and EMRT declarations

We complete the RMI Conflict Minerals Reporting Template (CMRT) for 3TG, and the Extended Minerals Reporting Template (EMRT) for cobalt, copper and nickel, which are alloying elements in some materials we use. Both are company-level declarations, based on our supplier evidence and our position as a downstream manufacturer, a reasonable and proportionate response. Our suppliers do not provide smelter data for the alloys we buy, so our declarations do not confirm the presence or absence of conflict minerals in specific products, and do not identify specific smelters or refiners linked to individual parts, batches or deliveries.

05 Product-level smelter requests

Requests to attribute specific smelters, refiners or mineral content to individual components fall outside recognised due diligence frameworks, cannot be substantiated through mill certification or manufacturing records, and are not supported by steel supply chain traceability. We therefore do not provide them. We would refer anyone making such a request to the OECD Guidance, Regulation (EU) 2017/821 and the RMI CMRT guidance, which define due diligence as a risk-based process relying on upstream data.

06 Ongoing commitment

We will keep our processes under review as regulations, industry standards and good practice develop. Our completed CMRT and EMRT are available to customers online and on request from sales@haguefasteners.co.uk.

APPROVED AND SIGNED

SIGNATURE

DATE
03/11/2026

NAME
Jon Hague

POSITION
Managing Director,
HAGUE FASTENERS LIMITED

REVISION HISTORY

Issue	Date	Details of change
6	03/11/2026	Supplier due diligence section updated; Extended Minerals Reporting Template (EMRT) added to the scope of our declarations; monitoring through a quality objective added.
5	12/10/2026	Redesigned; content unchanged.
4	01/04/2026	Updated for current RMI standards, EU and UK regulations, CAHRA definitions and supplier due diligence.