



HAGUE FASTENERS LIMITED

Conflict Minerals & Conflict Affected High Risk Areas Sourcing Policy

Hague Fasteners Limited maintains a responsible procurement policy for any materials that may contain identified Conflict Minerals, specifically tin, tantalum, tungsten and gold. Research and regulatory development show that supply chain risks also exist in a broader range of minerals and metals. Governments, non-governmental organisations, investors and industry bodies now expect companies to understand, assess and manage these risks throughout their supply chains.

Hague Fasteners Limited acknowledges the requirements of Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act, even though we are not directly subject to United States Securities and Exchange Commission reporting. We also recognise and support the European Union Regulation (EU 2017/821) which came fully into force on 1 January 2021, together with the responsible sourcing expectations that now apply in the United Kingdom following its withdrawal from the EU. These measures aim to prevent:

- conflict minerals and metals from being imported into the EU and the United Kingdom
- global and UK and EU smelters and refiners from using conflict minerals
- human rights abuses associated with mining activities

Hague Fasteners Limited supports the international effort to identify and discourage the use of minerals and their derivatives sourced from conflict zones, in particular the Democratic Republic of the Congo and its adjoining countries.



We will not knowingly purchase or use minerals or their derivatives that originate from conflict mines in the Democratic Republic of the Congo or adjoining countries unless they arise unintentionally through recycled or scrap content permitted under the EU and UK responsible minerals regimes.

Conflict Affected and High-Risk Areas are defined according to the Responsible Minerals Initiative Responsible Minerals Assurance Process Standard. This includes countries identified as high risk under relevant conflict minerals regulations. These include the Democratic Republic of the Congo and the adjoining countries specified in Section 1502 of the Dodd Frank Act, together with the indicative and non-exhaustive Conflict Affected and High-Risk Area list published by the European Commission under Article 14.2 of Regulation 2017.821. Hague Fasteners Limited also monitors broader industry guidance including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.

Hague Fasteners Limited maintains supply chain due diligence practices to support this commitment and requires relevant suppliers to do the same. All steel providers and other suppliers considered at potential risk of exposure to Conflict Minerals or Conflict Affected and High-Risk Areas are required to complete the current Responsible Minerals Initiative Conflict Minerals Reporting Template or, where applicable, the Extended Minerals Reporting Template. These tools allow us to review mineral origin, assess smelter and refiner information and align our processes with recognised international due diligence frameworks. Suppliers must also provide supporting statements to evidence responsible sourcing throughout their extended supply chain.

Hague Fasteners Limited reviews supplier declarations on a periodic basis and updates its processes as regulatory and industry expectations evolve, including revisions to Responsible Minerals Initiative standards and reporting templates.


Jon Hague (Director)