



Aeromet Conflict Materials Policy (Issue 3, June 2020)

Background

Armed groups operating in the eastern Democratic Republic of the Congo (DRC) have controlled many of the region's mines or transit routes and have engaged in armed conflict, as well as some of the world's worst human rights violations. Concern that proceeds from the mining of minerals have been used to fund extreme violence in that region led to a requirement in the U.S. Dodd-Frank Financial Reform Law of 2010, that U.S. publicly-traded companies must disclose any "conflict minerals" necessary to the functionality or production of products they manufacture or contract to manufacture. The conflict minerals are tin, tungsten, tantalum and gold (called the 3TG's). Companies using conflict minerals must also disclose their supply chain enquiries to verify whether these minerals originated in the DRC or adjoining countries.

On August 22, 2012, the SEC approved the final rule on conflict minerals. All public companies must evaluate their product lines to determine whether they contain necessary conflict minerals and if so, file a Form SD by May 31 annually beginning in 2014, for products they manufacture or contract to manufacture in the year. While the burden of compliance is on the public companies who manufacture those products, members of their supply chains for those products are also impacted.

Aeromet's Conflict Minerals Policy.

Aeromet deplores the violence in the DRC and adjoining countries and is committed to supporting responsible sourcing of conflict minerals from the region. Accordingly, Aeromet has adopted a conflict minerals policy regarding the acquisition of materials from these countries. Aeromet expects its suppliers to adopt a similar policy and to meet the expectations set out below.

Aeromet's Expectations from Suppliers.

- **Supply "DRC Conflict Free" materials.**

Under Aeromet's conflict mineral's policy, suppliers are expected to supply materials to Aeromet that are "DRC conflict free," which means either:

1) Any 3TGs necessary to the functionality or production of supplied materials must not directly or indirectly fund armed conflict in the DRC or adjoining countries, or

2) Any 3TGs must be from recycled or scrap sources. These are defined as being "recycled or scrap sources" if they are from recycled metals, which are reclaimed end-user or post-

Consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten, and/or



gold. Minerals partially processed, unprocessed, or a "bi-product" from another ore are not included in the definition of recycled metal. Item 1.01(d)(6) for Form SD, 77 Fed. Reg. 56274, 56364 (Sept. 12, 2012).

- **Adopt conflict minerals policies.**

Suppliers to Aeromet must adopt a policy regarding conflict minerals consistent with Aeromet's policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps.

Aeromet will conduct regular reviews of their materials providers to ensure that they are compliant to this policy.

Signed on behalf of Aeromet International Limited

Signature:

A handwritten signature in blue ink, appearing to read "H. Kimberley", with a long horizontal flourish extending to the right.

Name: Howard Kimberley

Position: Chief Executive Officer

Date:

July 2011