

INTRODUCTION

William Blythe, delivers speciality chemical solutions, across the globe, to help its customers meet the technological challenges of the 21st century and are committed to ethical business practices and the responsible sourcing of materials.

Conflict minerals are tungsten, tantalum, tin, and gold (3TG) that are mined in conflict-affected and high-risk areas [CAHRAs](#). These areas are defined under the [Responsible Minerals Initiative](#). Minerals mined in these areas have a high risk of being associated with armed conflict and human rights' abuses.

After thorough analysis, we have identified that we only source tin that falls within the scope of conflict minerals legislation. Furthermore, we conduct due diligence based on the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas | OECD](#) to ensure that tin remains the only 3TG that we source. William Blythe's policy is to be free of conflict minerals in all our business activities.

OUR COMMITMENT

To achieve this the management of William Blythe Limited will:

- Support the aims and objectives of the US ([SEC.gov | Conflict Minerals](#)) and EU ([Regulation - 2017/821 - EN - EUR-Lex](#)) legislation on the supply of conflict minerals
- Not procure specified metals that originate from facilities in conflict regions.
- Work closely with our suppliers to support our commitments and ensure compliance by:
 - Conducting appropriate due diligence and verifying the country of origin of the materials used in the products they supply to us.
 - Identifying smelters in their supply chain using the [Conflict Minerals Reporting Template](#) and requesting to provide a report to William Blythe annually.
 - Supporting initiative that determine whether smelters and refiners conform to Responsible Minerals Assurance Process (RMAP) [Standards](#), and expecting them to utilise such conflict free smelter/refinery programs.

Suppliers' willingness to comply with this policy is a factor in our sourcing decisions. If William Blythe determines that a supplier has failed to develop and implement reasonable steps to comply with this policy, William Blythe reserves the right to take appropriate action, which may include discontinuing the business relationship with the supplier.

Smelters mix minerals from various sources and are key to enforcing responsible sourcing by exercising due diligence in their selection of mineral sources. The RMAP identifies smelters that can demonstrate, through independent third-party assessment that the minerals they produce do not originate from sources that contribute to conflict in CAHRAs.

They refine them into metals used in our industry. Smelters play a key role in enforcing responsible sourcing by exercising due diligence in selecting their mineral sources.

William Blythe Ltd expects suppliers to steer their supply chain towards using only smelters validated via RMAP (or equivalent). A list of conflict-free validated smelters is available on the website of the Responsible Minerals Initiative (RMI). We request all suppliers using smelters that are not yet verified as conflict-free to encourage these smelters to participate in the RMI smelter audit program (or equivalent) or to switch to an already audited smelter.

William Blythe Ltd is dedicated to ensuring that our products do not contribute to conflict or human rights abuses. We expect our suppliers to share this commitment and work with us to achieve a transparent and responsible supply chain.

The Conflict Minerals Policy will be reviewed on an annual basis and amended, where appropriate.



David Crossley
Managing Director
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