

# Conflict Minerals Policy



The Pilgrim International Ltd Code of Conduct and Code of Conduct for Suppliers describes Pilgrim International Ltd's requirements for ethical behaviour of suppliers and sub-contractors as well as the extended supply chain. These requirements include respect for human rights and worker rights.

Pilgrim International Ltd supports efforts to end the violence and human rights violations involved in the mining of gold, tin, tantalum and tungsten (3TG) Conflict Minerals, including derivatives such as cassiterite, columbite-tantalite, and wolframite, from the "Conflict Region" of Africa comprised of the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries.

The United States Congress enacted the Dodd Frank Act which includes Section 1502 the "Act", requiring US manufacturers to file reports with the US Security and Exchange Commission (SEC), disclosing whether the products they manufacture or contract to manufacture contain "Conflict Minerals" that are "necessary to the functionality or production" of those products. The goal of this legislation is to stem the flow of income to the combatants in this war-torn region.

Pilgrim International Ltd is committed to achieving compliance with this legislation and its requirements.

Pilgrim International Ltd Policy on Conflict Minerals:

1. Pilgrim International Ltd will not knowingly procure Conflict Minerals from the DRC Region unless they are certified as "Conflict Free".
2. Pilgrim International Ltd will undertake reasonable due diligence to ensure compliance with these requirements, and require that our suppliers and subcontractors undertake reasonable due diligence within their supply chains to ensure their compliance. Such due diligence efforts include, but are not limited to, requiring relevant suppliers to provide written evidence documenting that raw materials used in the manufacture of components and products supplied to Pilgrim International Ltd originate from outside the DRC Region or are certified as "Conflict Free" by an independent third party.

This policy is not contractual and is not intended to create legal rights or duties independent of those that arise under contracts entered into by Pilgrim International Ltd or under the laws of the jurisdictions in which Pilgrim International Ltd conduct business. Pilgrim International Ltd reserves the right to revise this Policy at any time.

Authorised for external communication

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