

CONFLICT MINERALS COMPLIANCE POLICY



Purpose

The Barrett Steel Group (& subsidiary companies) does not purchase products containing minerals mined in contravention of the UN Guiding Principles on Business & Human Rights & sourced from the Democratic Republic of Congo or similarly affected countries. Whilst lists of countries affected are indicative, they are non-exhaustive & as such it won't necessarily include every area in the world affected by conflict, which means that we will comply with the regulations when operating in conflict-affected areas that aren't listed. We do not purchase any of the specified products in their natural or refined state. Barrett Steel Limited BES 6001 Cert no. 693829 Original Registration Date 15 Feb 2019

What Are “Conflict Minerals”?

In politically unstable areas, the minerals trade can be used to finance armed groups, fuel forced labour & other human rights abuses, & support corruption & money laundering. These so-called 'conflict minerals' such as tin, tungsten, tantalum & gold, also referred to as 3TG, can be used in everyday products. Tin can be listed as a 'tramp' element due to the recycling levels within the steel industry.

Which Countries Do “Conflict Minerals” Come From?

The countries or areas considered to be conflict-affected or high-risk are those:

- Whose natural resources include minerals which are in high demand, either locally, regionally or globally.
- &
- Are either suffering from armed conflict, such as civil war, a state of fragile post-conflict, or witnessing weak or non-existing governance & systematic violations of international law, including human rights abuses.

Commitment To Compliance

Barrett Steel Limited (and subsidiary companies) has robust systems in place to monitor & review legislation. This enables us to adapt to any new rules & regulations including the due diligence activities required to ensure we have achieved compliance throughout its supply chain.

Further Information

Email: Guy.barrett@barrettsteel.com or integrated_management_systems@barrettsteel.com

A handwritten signature in black ink, appearing to read 'Guy Barrett'.

Guy Barrett
Chief Operating Officer
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