

# BRADKEN

## CONFLICT MINERALS POLICY



As a socially responsible organisation, Bradken Limited and its subsidiary companies have concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights, comply with all laws and regulations, and follow a rigorous Code of Conduct.

Bradken fully supports the U.S. Government signed Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”).

In August 2012, the U.S. Securities and Exchange Commission (SEC) adopted the Conflict Minerals Final Rule to implement Section 1502 of the Dodd-Frank Act, which requires all U.S. publicly traded companies to file disclosures and reports with the SEC related to the use of Conflict Minerals in their products.

“Conflict Minerals” in this context refers to specific minerals originating from mines controlled by armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries, including the Republic of Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda and Zambia. Conflict Minerals include gold, tin, tantalum and tungsten.

As a supplier to many U.S. publicly traded companies who are required to disclose and report to the SEC the use of Conflict Minerals, Bradken Limited and its global subsidiaries are committed to complying with this legislation.

Bradken holds itself to the highest ethical standards and requires all its suppliers to fully support Section 1502 of the Dodd-Frank Act. Every supplier is required to certify that any Conflict Minerals sold to Bradken meet the requirements of the Dodd-Frank Act and that any material sold to Bradken is not from the DRC or the above stated adjoining countries.

Bradken rigorously audits its supply chain and manufacturing inputs to identify any potential use of Conflict Minerals as defined in the legislation and if at any time Bradken is required by customer specification to use alloying materials containing any of the aforementioned minerals in its manufacturing process, Bradken will provide documentary evidence attesting that no Conflict Minerals were sourced from the DRC or any adjoining countries.

**Paul Zuckerman** – CEO

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