Conflict Minerals Policy Statement

“Conflict Minerals” refers to certain minerals and their derivatives mined in the eastern province of the Democratic Republic of the Congo (“DRC”) and in the adjoining countries (“DRC Region”) where revenues generated by their sale may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In July 2010, the United States passed the Dodd-Frank Financial Reform Bill. Section 1502 of this bill requires all U.S. stock listed companies and their suppliers to disclose the chain of custody usage of Conflict Minerals (Tin, Tantalum, Tungsten, and Gold).

In 2017, Regulation (EU) 2017/821 of the European Parliament and of the European Council of 17 May 2017 was passed concerning supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

Dawson Shanahan supports this legislation and supports efforts to eliminate the use of Conflict Minerals.

Dawson Shanahan does not procure Conflict Minerals directly from suppliers.

Our sub suppliers are expected to have undertaken due diligence to ensure that any minerals purchased by them originate from outside of the Conflict Region.

Suppliers must pass this requirement through their own supply chain and determine the source of specified minerals ensuring that minerals are only sourced from responsible sources.

David Howell
Operations Director
Dawson Shanahan Wales Ltd