

Conflict Mineral Statement

Section 1502 of the “Dodd-Frank Wall Street Reform and Consumer Protection Act” identifies “Conflict Mineral” as financing armed conflict in the Democratic Republic of the Congo (DRC) or in the regions defined as Conflict-Affected Areas and High-Risk Areas (CAHRAs). The term 'conflict minerals' as defined by the US legislation, currently include the metals tantalum, tin, tungsten and gold (also known as 3TG).

Our Policy

Gulmay Ltd. is committed to sourcing materials and supplies from companies that share our values with regard to ethics and integrity, respect for human rights, and environmental responsibility. This includes the sourcing of “Conflict Minerals”, 3TG. While we do not source these metals directly, they may exist in the materials and components we source. We are therefore committed to working with our customers and suppliers to responsibly source the materials and components we use in manufacturing our customers’ products which may contain these minerals.

We aim to achieve a 'conflict free' supply chain – that is, a supply chain that does not directly or indirectly finance armed groups through mining or mineral trading in the DRC region. Gulmay Ltd. requires suppliers where possible to provide written confirmation of their due diligence with regard to these minerals (specifically 3TG) confirming that parts supplied do not originate from mining or smelting operations in the CAHRAs to the best of their knowledge.

Gulmay Ltd. is not a manufacturer of electronics parts and therefore is not in a position to provide accurate information relating to the use of conflict minerals in the products it distributes. The manufacturers of the electronic components and products are the only source of accurate information regarding any conflict minerals that may have been used in the manufacture of their products.

Communicating with Suppliers

All suppliers (with related components) are encouraged to provide accurate and transparent information about the origin of all products supplied to our company. In addition, we require the following from our suppliers:

- To source materials from socially responsible sub-tier suppliers and manufacturers
- To assist in complying with regulations related to conflict minerals
- To pass these requirements along to their sub-tier suppliers

Our Commitment to Customers

We firmly believe that our customers should be fully informed about the products they purchase. While we may not be able to certify as to the country of origin of the minerals contained in the products manufactured by our suppliers, we are committed to working with our customers to supply products that meet our customer’s specifications.

We request the following from our customers:

- To design in components that can be sourced from socially responsible suppliers
- To assist in complying with regulations related to conflict minerals
- Support supply chain changes required to eliminate DRC conflict minerals from products

Gulmay Ltd. (as a purchaser) is many steps removed from the mining of conflict minerals. We do not purchase raw ore or unrefined conflict minerals and we do not knowingly procure any parts containing conflict minerals from the covered countries. The process of tracing the conflict minerals through the supply chain is not straight forward as we have various suppliers who supply us with thousands of components. The ability to draw down to the original Smelter Information is a major challenge due to the numerous steps removed we are from the mining of conflict minerals.

Therefore, Gulmay Ltd. declaration on the CMRT currently can only indicate smelters Not Yet Identified/Unknown. This situation is unlikely to change until our suppliers have obtained this information from their procurement chain. We will rely on industry initiatives, such as the Conflict Free Smelter Program, for assistance in complying with any reporting requirements on conflict minerals.

Gulmay Ltd. is committed to working with our customers and our suppliers to ensure effective implementation of this legislation.



.....
Andrew Platten
Operations Director
21st February 2023