

GLOBAL POLICY ON CONFLICT MINERALS



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CONFLICT MINERALS**



Malvern Panalytical Conflict Minerals Policy

This document contains our policy regarding the use of conflict minerals (as defined below) in our products. “Malvern Panalytical,” “we,” “its,” “us” and “our” refers to Malvern Panalytical and its consolidated subsidiaries.

This policy will be reviewed and updated as needed.

Regulatory Overview

In the past decade, there has been an increasing focus on the trade of minerals from conflict-affected and other high-risk areas, as the trade has been a means to fund armed groups that are perpetuating conflict and committing human rights abuses.

The Conflict Minerals Rule, adopted by the U.S. Securities and Exchange Commission (“SEC”) in 2012, is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the Democratic Republic of the Congo (the “DRC”). Under the Conflict Minerals Rule, we are required to engage in a reasonable country of origin inquiry, to determine whether the conflict minerals originated in the DRC or one of its adjoining countries (the “Covered Countries”), and to make certain disclosures on the SEC’s Form SD, to the extent that such conflict minerals are necessary to the functionality or production of products that Malvern Panalytical contracts to manufacture. Additional due diligence and disclosure obligations are triggered, if the conflict minerals are from a Covered Country, or we are unable to determine the source of the conflict minerals.

“Conflict minerals” are cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. This term applies irrespective of the origin of the minerals or their derivative metals. In addition to the DRC, the Covered Countries are: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

On 1 January 2021 a new law came into full force across the EU – the Conflict Minerals Regulation. The Conflict Minerals Regulation **aims to help stem the trade in four minerals – tin, tantalum, tungsten and gold** – which sometimes finance armed conflict or are mined using forced labour. This Regulation seeks to promote the responsible sourcing of largely the same minerals and metals as are the subject of the SEC’s Conflict Minerals Rule, but from conflict-affected and high-risk areas anywhere in the world. Our policy is aligned with the spirit of the EU Conflict Minerals Regulation, since it is consistent with our Values and commitment to corporate responsibility.

Malvern Panalytical Policy Statement

Malvern Panalytical takes its obligations under SEC and other regulations seriously. Malvern Panalytical also has adopted this policy as part of our larger efforts to encourage our suppliers to respect human rights and not contribute to conflict.

Malvern Panalytical does not directly source conflict minerals from mines, smelters or refiners, and is not in a position to identify on its own these market participants. We therefore require the cooperation of our suppliers in the implementation of this policy and in enabling Malvern Panalytical to meet its compliance obligations.

Supplier Requirements

Suppliers who supply or manufacture components, parts or products containing conflict minerals are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict or human rights abuses. Without limiting the foregoing, suppliers are expected to directly and indirectly source conflict minerals only from sources that do not directly or indirectly finance or benefit “armed groups” (as that term is defined in the Conflict Minerals Rule), whether in a Covered



Country or another part of the world. This policy applies to conflict minerals contained in components or parts of products supplied to or manufactured for Malvern Panalytical, irrespective of who has manufactured or provided the specifications for the particular component or part. Suppliers are expected to take the following steps in furtherance of this policy:

- implement and communicate practices and policies that are consistent with this policy to their employees and their suppliers;
- familiarise themselves with the Conflict Minerals Regulation (EU), Conflict Minerals Rule (US), and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “Guidance”)
- put in place procedures for the traceability of conflict minerals, working with their suppliers as appropriate;
- where possible, source conflict minerals from smelters and refiners validated by independent third parties as being conflict-free or the equivalent;
- maintain reviewable business records supporting the source of conflict minerals;
- from time to time, at our request, provide to us written certifications and other information concerning the origin of conflict minerals included in products, components and parts supplied to Malvern Panalytical and the supplier’s compliance with this policy generally;
- adopt a risk management strategy with respect to identified risks in the supply chain that is consistent with this policy;
- otherwise establish policies, due diligence procedures and management systems that are consistent with the Guidance; and
- require their direct and indirect suppliers to adopt policies and procedures that are consistent with those contained herein.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

We do not seek to embargo responsibly sourced minerals from conflict-affected and high-risk areas, and encourage our suppliers to continue to source from these areas, to the extent they can do so responsibly.

Conflict Minerals Rule and Recycling Business

For purposes of the conflict minerals rule, conflict minerals that are sourced from recycled or scrap materials are deemed to be “DRC conflict free” and require disclosure only about the inquiry that led the reporting company to conclude that they were from those recycled or scrap sources. That means that for products whose conflict minerals are from recycled or scrap sources, there is no requirement to undertake due diligence or to report their processing facilities, countries of origin, or efforts to determine mine or location or origin.

Conflict minerals from recycled and scrap sources are given special treatment under the Rule because, as a practical matter, it is impossible to trace the mine of origin of materials that are recovered from existing products and materials and combined into the recycled or scrap material.

Assessing and Responding to Identified Risks

Malvern Panalytical believes in establishing and maintaining long-term relationships with suppliers whenever possible. If we determine that a supplier may be violating this policy, we may require that supplier to commit to and implement a corrective action plan, within a reasonable timeframe.

Malvern Panalytical uses EcoVadis as a platform for assessing and responding to identified risks. If EcoVadis identifies a supplier as a risk with regard to conflict minerals, an action plan



will come into place to address and mitigate possible risks. High-risk suppliers will be closely monitored.

Continued failure to adhere to Malvern Panalytical's policies and refusal to address issues of concern may lead to termination of our business relationship with the supplier. Nothing contained in this policy shall be interpreted to preclude Malvern Panalytical from terminating any supplier relationship at any time for any reason.