

OXLEY DEVELOPMENTS COMPANY LIMITED	DOCUMENT REFERENCE ODC:HSE:3055	DOC LEVEL 3
DOCUMENT TITLE Conflict Minerals Policy	ISSUE 3	DATE 13 Sep 2018

Revision History

Description of change	Date	Revision
New document	Apr 2013	1
Change of Signatory	Jan 2014	2
Transfer to new template to include process owner and change in CEO	13 Sep 2018	3

1. Purpose/Scope

Defines the policy for management of conflict minerals within Oxley Developments Company Limited

2. Responsibility

Those responsible for the procurement of components, products or services which contain conflict minerals.

3. Associated Documents

None

4. Procedure

Conflict Minerals Policy Statement

Oxley Developments Company Limited supports ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. The U.S. Securities and Exchange Commission (“SEC”) have adopted rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future. We support these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals”.

OUR COMMITMENT:

1. Support the aims and objectives of the U.S. legislation on the supply of “conflict minerals”
2. Not knowingly procure specified metals that originate from facilities in the “Conflict Region” that are not certified as “conflict free”
3. Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from:
 - Mines and smelters outside the “Conflict Region” **or**
 - Mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”.

This due diligence includes having our suppliers provide written evidence documenting that raw materials used to produce gold, tin, tantalum and tungsten, used in the materials to manufacture components and products supplied to Oxley Developments, originate from outside the “Conflict Region” **or** if they originate from within the “Conflict Region”, that the mines or smelters be certified as “conflict free” by an independent third party. The aim is to ensure that only “conflict free” materials and components are used in products that we procure.

If we discover the use of these minerals produced in facilities that are considered to be “non-conflict free”, in any material, parts or components we procure, we will take appropriate actions to transition product to be “conflict free”.

A handwritten signature in black ink, appearing to read "Garry North".

Garry North
CEO Oxley Group

	Name:	Date:	Job Title / Position:
PROCESS OWNER:	Kieth Denison	13 Sep 2018	Group Quality Manager

The instructions contained in this document are mandatory and shall not be changed or amended except through the official document change procedure