

Recab Policy on Conflict Minerals

Background

In August 2012, the United States Securities and Exchange Commission (“SEC”) issued its final rules regarding “Conflict Minerals” (known as ‘3TG’ – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd – Frank Wall Street Reform and Consumer Protection Act (the “Act”). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the Act.

Recab strives to be a good corporate citizen. We are committed to ensuring the health, safety and protection of people who come into contact with our products and business, and we require high social, environmental and human rights standards among our suppliers. Managing our obligations in relation to Conflict Minerals is a part of Recab corporate responsibility.

Recab’s commitments

We are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries. Therefore we are committed to:

- Identifying which Recab products are impacted and targeting our efforts accordingly
- Not buying products and materials containing Conflict Minerals directly from Conflict Mines

In addition, we are committed to engaging with our customers regarding their disclosure obligations.

Recab’s measures

In working towards these commitments, we have taken a number of steps that include:

- Establishing a “Conflict Minerals Compliance Program” to review the use of Conflict Minerals in our products and to be in a position to fulfil future reporting obligations and respond to customer inquiries.
- Requiring our suppliers to implement a policy regarding Conflict Minerals and exercise due diligence to investigate the source of these minerals.
- Engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. In the future, our suppliers’ willingness to comply with this initiative will be a factor in our sourcing decisions.
- Updating the Recab Supplier Code of Conduct and our purchasing terms and conditions to reflect this policy.

Like many other companies tracing Conflict Minerals, it will also take time for Recab with our many suppliers and high product complexity, to collect the information needed for us to fully understand our use of Conflict Minerals and therefore be able to address all related customer concerns.