



PRV.LTD
ENGINEERING
ONE ANSWER, MANY SOLUTIONS

PRV ENGINEERING LTD

POLICY ON CONFLICT MATERIALS

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 of this, many companies are now addressing whether or not, and if so, 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.

PRV Engineering Ltd 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 this corporate responsibility.

PRV Engineering Ltd 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. By doing so we have committed to:

- identifying which PRV Engineering Ltd products are impacted and targeting our efforts accordingly
- not buying products and materials containing Conflict Minerals directly from Conflict Mines
- asking our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to PRV Engineering Ltd originate from Conflict Free sources
- contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals

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

PRV Engineering Ltd activities

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

- establishing a “Conflict Minerals Compliance Program” supported and sponsored by the management team to review the use of Conflict Minerals in our products and to be in a position to fulfil our reporting obligations to the SEC and respond to customer inquiries. This program was developed based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and other appropriate international standards.
- 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 PRV Engineering Ltd Supplier Code of Conduct and our purchasing terms and conditions to reflect this policy.

Like many other companies tracing Conflict Minerals, it will take time for a us 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.