

Conflict Minerals Statement

Eurotherm Limited is committed to supporting the efforts of human rights organizations around the world. It is believed that mining and trade of 'Conflict Minerals' help finance armed groups responsible for committing human rights abuses in many parts of the world.

On 22 August 2012, the U.S. Securities and Exchange Commission ("SEC") approved the Final Rule regarding sourcing of Conflict Minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Dodd-Frank Act"). Conflict Minerals currently are Tantalum, Tin, Tungsten, Gold and/or their derivatives.

The rule enforces reporting requirements on publicly traded companies to annually disclose the occurrence of Conflict Minerals originating in the Democratic Republic of the Congo ("DRC") or surrounding countries in the products they manufacture or contract to manufacture whereby the Conflict Minerals are necessary to the functionality or production of a product.

Similarly, Regulation 2017/821 of the European Parliament and of the Council of 17 May 2017, which outlines the supply chain due diligence obligations for importers of Tin, Tantalum and Tungsten, their ores and Gold originating from Conflict-Affected and High-Risk Areas (Conflict Minerals Regulation) was published in the Official Journal on 19 May 2017. The regulation requires importers to report due diligence activities and the origins of the minerals they use in their product manufacturing.

On 1 January 2021 the new law came into full force across the EU - the Conflict Minerals Regulation (EU) No. 2017/821 - which aims to control the trade in Tin, Tantalum, Tungsten and Gold (3TG). The regulation requires all importers to the EU of any of these four elements in quantities of over 1000 kg per year to register their company and undertake due diligence on their supply chain in line with the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

In one area of the UK, Northern Ireland, the EU regulation is legally binding; when the UK recently took itself out of the EU ('Brexit') a withdrawal agreement was signed between the EU and the UK which led to Northern Ireland remaining in the European Union Customs Union and European Single Market while also being part of the UK. This interesting arrangement avoids the need for a 'hard' customs border on the island of Ireland, but as a result, any company importing 3TG into Northern Ireland must comply with the EU Conflict Minerals Regulation in full.

Eurotherm refuses to use any products, or raw materials, which either directly or indirectly, fund these groups. As part of this commitment, we have implemented a policy to buy from responsible, trusted sources, to take reasonable steps to understand supply chains, and when necessary, influence suppliers towards responsible sourcing, and to not contract with suppliers identified to be sourcing from or relating to people violating fundamental human rights.

Signed:



Date: 07-Mar-2023

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