

Conflict Minerals Policy

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In politically unstable areas, the minerals trade can be used to finance armed groups, fuel forced labour and other human rights abuses, and support corruption and money laundering. These so-called 'conflict minerals' such as tin, tungsten, tantalum and gold, also referred to as 3TG, can be used in everyday products such as mobile phones and cars or in jewellery. It is difficult for consumers to know if a product they have bought is funding violence, human rights abuses or other crimes overseas.

The countries or areas considered to be conflict-affected or high-risk are those:

- Whose natural resources include minerals which are in high demand, locally, regionally or globally.

and

- Are either suffering from armed conflict, such as civil war, a state of fragile post-conflict, or witnessing weak or non-existing governance and systematic violations of international law, including human rights abuses.

As a socially responsible company, ATEC has concern for the well-being of people and communities. Our purchasing team is responsible for achieving the best overall value (supplier selection based on price, delivery and quality), flexibility and responsiveness (materials management) and lowest overhead when acquiring or contracting for goods, services and intellectual property assets.

We are committed to conflict free sourcing. Our supply chain will not knowingly source materials with suppliers, who are known to be noncompliant with Section 1502 of the Dodd Frank Act, EU2017/821(this is voluntary within the U.K. except N.I.) or on information gathered from our suppliers, ATEC have never knowingly sourced conflict minerals that contribute to conflict in any Region. We are working with our suppliers to conduct due diligence and implement policies and procedures such that they can provide all necessary information for ATEC this will allow us to make proper and accurate disclosures as and when required. Any suspected incident(s) should be reported to ATEC via email/text/incident report form.



ATEC Safety & Compliance Manager