



Conflict Minerals Policy

The definition of “conflict minerals” refers to the extraction and trade of gold, 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

- To not knowingly procure the specified metals that originate from facilities in the “Conflict Region” that are not certified as “conflict free”.
 - Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that the 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 manufacture components and products supplied to P.A. Thorpe Ltd, 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 it is determined that the use of these minerals are produced in facilities that are considered to be “non-conflict free” in any material, parts or components we procure, we will take appropriate actions, in conjunction with our suppliers, for the transition to “conflict free” sources.

Signed

A handwritten signature in black ink that reads 'Marion Thorpe'.

Marion Thorpe
Managing Director
P. A. Thorpe (Vehicle Components) Ltd.
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