



Purpose: To address the use of Conflict Minerals at a Company Level within The Brockmoor Foundry

How does the Securities and Exchange Commission Rule for Disclosing the use of Conflict Minerals affect The Brockmoor Foundry?

Brockmoor Foundry is not required to comply with the reporting obligations of the SEC rule for disclosing the use of conflict minerals* (referred to herein as the “Conflict Minerals Rule”). The Conflict Minerals Rule applies to companies that are required to file reports with the Securities and Exchange Commission (the SEC) under Sections 13(a) or 15(d) of the Securities Exchange Act of 1984 (“Exchange Act”).

Although Brockmoor Foundry is not required to file reports under either Sections 13(a) nor 15(d) of the Exchange Act and therefore is not subject to the Conflict Minerals Rule, it is likely that customers of Brockmoor Foundry are subject to the Conflict Minerals Rule and will be looking to Brockmoor as a supplier for information pertaining to the point of origination of tin, tungsten, tantalum or gold (collectively referred to as “conflict minerals”). Therefore, The Brockmoor Foundry should act according to its Code of Conduct and avoid purchasing minerals from sources that are not with certainty known to be free from unethical or illegal activities. The Brockmoor Foundry should also undertake to identify whether any conflict minerals used in its products or materials originate in the Democratic Republic of the Congo or its adjoining countries. Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively referred to as the “Covered Countries”).

(*) the origin of these rules is the US Dodd-Frank Act.

Does The Brockmoor Foundry products use or contain any conflict minerals?

Yes, a number of machined products within Brockmoor use tungsten in their production.

How does Brockmoor determine that there are no conflict minerals in the products?

Brockmoor Foundry has a common sourcing function for the raw materials used within its production and hence a good control of the suppliers. The suppliers are contracted and familiar with our Code of Conduct. Brockmoor keeps an open dialogue with its suppliers over time and follows up to ensure the contract is observed. Additionally, Brockmoor Foundry has spoken to each of its suppliers of conflict minerals, has received representations that the conflict minerals did not originate from the Covered Countries, and is not aware of any information that suggests that any of the representations received from its suppliers are false.

Is it possible for products made at The Brockmoor Foundry to contain conflict minerals originating in the Covered Countries?

Brockmoor has sought and received representations from each of its suppliers of conflict minerals that such conflict minerals did not originate from the Covered Countries, and is not aware of any information that suggests that any of the representations received from its suppliers are false. Therefore, Brockmoor has no reason to believe that any of its products or materials contain conflict minerals that originated in the Covered Countries.

What is Brockmoor Foundry’s approach to Conflict Minerals?

Brockmoor Foundry condemns all activities in the raw material sector connected to illegal or unlawful exploitation of ores and that directly or indirectly finances or benefits armed groups in conflict areas.

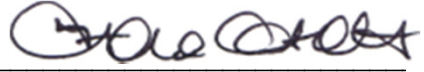
Brockmoor Foundry fully supports the activities of the Organisation for Economic Co-operation and Development (OECD) to avoid the use of raw materials which finance armed groups in the Democratic Republic of Congo (DRC) or neighbouring countries.



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Brockmoor Foundry is committed to supporting its customers in their compliance with the Conflict Minerals Rule.

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Authorised : 

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