

# Conflict Minerals Policy Statement

January 2026

Invertex Drives, as part of the SHI Group, are committed to advocating the end of human rights and environmental violations. One of the ways that we ensure this, is by complying with both the Dodd Frank Act and by the Mineral Supply due diligence guidance, by placing significant emphasis on holding the source of a smelter accountable when ending the violence, human rights crimes and environmental impacts in the mining of certain minerals. Both legislations specify the reporting and disclosure requirements related to "conflict minerals; This is from a location described as the "Conflict Region", which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries, along with Conflict affected and High-Risk Countries. The requirements call for manufacturers who file certain reports to disclose whether the products they manufacture or contract to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products. By following these frameworks, we also ensure compliance with the UK Bribery Act.

Invertex Drives Ltd - a leading Welsh electronics manufacturer, recognises our obligation to develop as a sustainable industry and notes that the prudent and responsible use of natural resources is an important driver of economic growth. We are also aware of specific concerns regarding raw material supply, in particular whether they are recycled or sourced directly in countries such as Rwanda, Congo, and Angola. This is why, although we source from High-risk areas, we ensure that we are doing this responsibly and with transparency.

Based on the OECD Five Step Framework and guidance, we are able to meet responsible sourcing expectations.

- 1. Establish Management Systems** – Invertex place priority on mapping our supply chain and promoting communication across all compliance-based requirements. We update our CMRT Template and Statement annually and expect the same from all suppliers. We also encourage RMI training for the team to complete, to further their understanding of the expectations.
- 2. Identify and Assess Risks** – After receiving our suppliers' templates back, we review the information to identify high and significant risk actions.
- 3. Respond to Risks** – Invertex take steps to work collaboratively with our supply chain to mitigate these risks, and where necessary transition away from these smelters, or open a conversation about moving away from a certain supplier, to ensure responsible sourcing.

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- 4. Carry out Third Party Audit** – Where necessary we ask our suppliers to request for this smelter to participate in the RMAP Audit Program. It is important that we encourage where appropriate.
- 5. Communicate and Report Findings** – Our CMRT Statement is publicly released to our website and customers where appropriate.

In addition to our compliance with CMRT, we also place consideration on the Extended Mineral Reporting Template, which along with Tungsten, Tin, Tantalum & Gold includes Cobalt, Mica & Copper. Invertex request this template along with our Conflict Minerals.

Invertex Drives Ltd endeavors to conduct all activities in a manner contributing to the wider goal of sustainable development, continuously taking into consideration any relevant international agreements, principles, objectives & guidance and human rights standards. Our manufacturing processes are certified to both BS EN ISO 9001:2008 and EN ISO 14001:2004. We ensure compliance with relevant legislation which involves consideration to Environmental, Social and Governance factors.

The Dodd-Frank legislation and EU Mineral Supply due Diligence Guidance has the full commitment of IDL and our intention to comply. Having carried out thorough and diligent research into our sources of supply chain, component and assembly, we are confident that all our supply chain is continuously working to be free from any materials that may cause concern.

**John Evans**

A handwritten signature in black ink, appearing to be 'John Evans'.

Procurement

**Invertex Drives Limited** Offa's Dyke Business Park, Welshpool, Powys, UK, SY21 8JF

**Tel:** +44 (0)1938 556868 | **Fax:** +44 (0)1938 556869 | **Email:** sales@invertexdrives.com

Registered in England No. 3504834 VAT Number GB 712854929