

Conflict Minerals Policy Statement



January 2024

Invertek are committed to advocating the end of human rights 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, by means of placing significant emphasis on holding the source of a smelter accountable in ending the violence and human rights crimes in the mining of certain minerals.

Both of these 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. As The requirements call for manufacturers who file certain reports with the SEC 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.

Invertek Drives Ltd - as a leading Welsh electronics manufacturer, recognises the need to develop as a sustainable industry and note that the prudent and responsible use of natural resources is an important driver of economic growth. We recognise 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** – Invertek 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** – Invertek 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 either ask our suppliers or ourselves 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 Drives Ltd endeavors to conduct all its activities in a manner contributing to the wider goal of sustainable development, taking into consideration any relevant international agreements, principles, objectives & standards and human rights. 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 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 of our supply chain is free from any materials that may cause concern.

Mike Dean

Global Supply Chain Manager

A handwritten signature in blue ink, appearing to read 'Mike Dean'.

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