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Conflict Minerals Policy

General

This statement provides an outline of our policy for the sourcing of materials that contain or are manufactured from minerals sourced from conflict affected and high risk areas in line with our corporate policy, legal obligations and existing international standards.

For the purpose of this policy conflict minerals are those associated with tantalum, tin, gold and tungsten.

Our Commitment to Sourcing Items Associated with Conflict Minerals

Biral is committed to ensure that conflict minerals contained in our products are sourced with due respect for human rights, the need to avoid contributing to conflict, and the desire to support development through our supply chain practices.

At the same time, Biral does not ban the use of conflict minerals that originate in conflict affected and high risk areas when they are sourced in accordance with existing international standards. Avoiding the sourcing of all conflict minerals from these areas would cause a de facto embargo with serious adverse impact on the living conditions of local populations.

Working with Our Suppliers

We require that our suppliers ensure the products and materials supplied to Biral which are associated with conflict minerals are sourced in accordance with our policy as given above.

We are incorporating into our purchasing procedures and documents conditions requiring suppliers to adopt a policy on the responsible sourcing of conflict minerals and to periodically provide to us information we need to support our obligations and policy. An overview of these procedures is provided on the following page.

Paul Smith CEng MIET Managing Director

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Overview of Conflict Minerals Policy Impact on Policies and Procedures

Purchase Orders

All purchase orders shall include the following statement:

All items supplied against this purchase order that contain Tin, Tantalum, Tungsten or Gold must be sourced in accordance with the OECD guidelines on conflict free mineral supply chains.

Supplier Review

A register of major suppliers of items potentially containing conflict minerals shall be maintained.

The compliance of each supplier in the register with the Company's conflict minerals policy shall be reviewed at least once per year, normally in the second quarter. The result of the review shall be recorded in the register of conflict minerals suppliers.

Where inadequate evidence of compliance with the Company's conflict minerals policy is found the continued use of the supplier shall be subject to the approval of a Company Director. Approval shall only be granted where reasonable alternative sources of supply are not available.

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