

EDWARDS POLICY ON CONFLICT-FREE MINERALS

The Concern

There is concern that the profits from some mineral mining in the Democratic Republic of the Congo (DRC) are used to fund armed conflict in that region.

In response to these concerns, a US law requires companies listed in the US to report any use of "conflict minerals" (tin, tungsten, tantalum and gold – 3TG) which originate from the DRC or adjoining countries, and could directly or indirectly fund conflict in the region.

Edwards Policy

Edwards Ltd maintains high standards of ethical conduct, complies with all applicable laws, and does business only with persons who themselves abide by laws and ethical principles. We apply the same principles to our own operations and to our suppliers throughout the world, wherever we operate and do business. These principles are expressed through our Code of Conduct and our Ethical Purchasing Policy.

Edwards does not directly purchase tin, tungsten, tantalum or gold. However, our commitment to social responsibility extends to our supply chain. These minerals are contained in some components which we purchase. We source these components from reputable Edwards-approved suppliers in Europe, America and Asia, and have no reason to believe that they contain minerals sourced from conflict regions of the DRC or its neighbouring countries.

As a member of the Electronics Industry Citizenship Coalition (EICC), our Ethical Purchasing Policy is based on the EICC Code, and requires our suppliers to: assure that the 3TG their products does not benefit armed groups in the DRC or adjoining countries; exercise due diligence on the source and chain of custody of these minerals; and make their due diligence measures available to customers on request.

Actions Underway

We regularly risk assess our key and strategic direct suppliers to identify those whose products may contain 3TG, and require identified suppliers to supply detailed information on their conflict minerals status and supply chain due diligence measures. Data collection is still underway, however we have full responses from the majority of identified suppliers and no conflict minerals have been found to date.

As part of their commitment to improving social and environmental conditions in electronics supply chain, industry bodies such as the Global e-Sustainability Initiative (GeSI) and the Electronic Industry Citizenship Coalition (EICC) are developing "known origin" compliance systems. Edwards, as a member of EICC, supports these initiatives and is committed to supporting its customers and suppliers in being "conflict-free" compliant.



Hugh Kelly, Global Vice President – Procurement