TRUTURN
PRECISION ENGINEERING

CONFLICT MINERALS POLICY

1. Policy statement

Truturn Precision Engineering (Charfield) Ltd is committed to the responsible sourcing of minerals throughout our global supply chain. Our policy is to avoid the direct or indirect procurement of minerals that finance, or benefit armed groups in the Democratic Republic of Congo (DRC) or adjoining countries, or that are associated with human rights abuses. The minerals we focus on are the "3TGs": tin, tantalum, tungsten, and gold.
While we are not an importer of raw minerals, we recognise our position as a "downstream" user in the supply chain. We are dedicated to working with our customers and suppliers to ensure transparency and ethical practices.

2. Scope

This policy applies to Truturn Precision Engineering (Charfield) Ltd and all our employees, subcontractors, and suppliers. We expect our suppliers to adopt and implement similar policies in their own supply chains.

3. Commitment to responsible sourcing

In line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, we commit to the following principles:

Ethical conduct: Upholding high ethical standards in all business operations.
Supply chain transparency: Enhancing the traceability of minerals in our supply chain.
Due diligence: Implementing reasonable due diligence measures to identify and address supply chain risks.
Collaboration: Working with our customers, suppliers, and industry initiatives to improve mineral sourcing practices.

4. Supplier expectations

We expect all our suppliers to comply with this policy and to take action to source minerals responsibly.
Suppliers are required to:
Adopt and communicate a conflict minerals policy to their own suppliers.
Provide a completed Conflict Minerals Reporting Template (CMRT) upon request to identify the smelters and refiners in their supply chain.
Work towards sourcing 3TGs from facilities that have been validated as "conflict-free" by independent third-party audits, such as those conducted under the Responsible Minerals Assurance Process (RMAP).
Cooperate with any reasonable country of origin inquiries (RCOI) and supply chain due diligence requests from Truturn.
Maintain accurate business records to support their due diligence efforts.

5. Management system

Truturn Precision Engineering will establish and maintain a management system to support our conflict minerals due diligence efforts. This includes:

Risk assessment: Identifying and assessing suppliers that are most likely to provide materials containing 3TGs.
Performance monitoring: Tracking supplier responses and compliance with our sourcing requirements.
Risk mitigation: Designing and implementing a strategy to respond to identified supply chain risks, including working with non-compliant suppliers to achieve compliance or, if necessary, terminating the business relationship.
Employee training: Educating relevant employees on the importance of this policy and their role in its implementation.

6. Reporting and disclosure

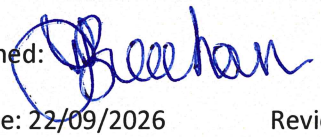
We will communicate our conflict minerals policy to suppliers and customers as appropriate. While specific reporting requirements may not apply directly to Truturn as a downstream user, we will provide information to our customers as needed to support their compliance with regulations such as the EU Conflict Minerals Regulation.

7. Continual improvement

We recognise that responsible mineral sourcing is an ongoing process. We are committed to continuously reviewing and improving our due diligence practices as international standards and regulatory requirements evolve.

8. Management responsibility

The management of Truturn Precision Engineering (Charfield) Ltd has overall responsibility for the implementation and enforcement of this policy.

Signed:  Print: Rebecca Beacham – Managing Director

Date: 22/09/2026 Review Date: 22/09/27