

Conflict Minerals Policy

Introduction

McLaren Applied Technologies (MAT) is committed to preventing conflict, building stability overseas, improving the protection of human rights and the rule of law. To this end, MAT acknowledges it has a key role to play in respecting human rights through responsible operations and respecting all relevant national and international laws and standards.

MAT will follow the procedures set out in this policy document to help ensure that any trading relating to natural resources from the DRC or products including components incorporating such minerals will be conducted in a way which is socially, economically and environmentally acceptable, including adhering to the relevant voluntary OECD guidance and guidelines.

Effective 1st February 2018

Background

In politically unstable areas, armed groups often use forced labour to mine minerals. They then sell those minerals to fund their activities, for example to buy weapons. These so-called 'Conflict Minerals', may find their way into products.

In August 2012, the United States Securities and Exchange Commission ("SEC") issued its final rules regarding "Conflict Minerals" (known as '3TG' – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the DRC and the adjoining countries named in the Act.

A new EU law to address the trade in Conflict Minerals was passed in May 2017 to stop:

- Conflict Minerals and metals from being exported to the EU;
- global and EU smelters and refiners from using Conflict Minerals; and
- mine workers from being abused in connection with Conflict Minerals.

The law also supports the development of local communities. It requires EU companies to ensure they import these minerals and metals from responsible sources only. It will become a legal requirement on 1 January 2021, in the meantime MAT will put measures in place to ensure compliance in advance of enactment.

MAT's commitments

MAT is working towards ensuring that its products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the DRC or adjoining countries. Therefore, MAT is committed to:

- identifying which products are impacted and targeting our efforts accordingly;
- not buying products and materials containing Conflict Minerals unless MAT has confirmation they are not from DRC; and
- asking MAT suppliers to ensure the 3TGs originate from conflict free sources.

In addition, MAT is committed to engaging with its customers regarding their disclosure obligations.

MAT's measures

In working towards these commitments, MAT has updated its supplier T&Cs to reflect this policy and will take all reasonable measures to ensure compliance with the Act and all pending UK and EU legislation.