VESUVIUS

Conflict Minerals Policy

Dept: Compliance	Version number: 1.0	Effective from:
Owner: [Compliance Director]	Reviewed by: Henry Knowles	October 2022
Created by: Alexander Laugier-Werth	Approved by: Group Executive Committee	Issue date:
Created: September 2022	Approval date: November 2022	December 2022

I. Introduction

European Union and United States legislation and OECD due diligence guidance generally define **conflict minerals** as minerals mined in countries either suffering from armed-conflict, such as civil war, a fragile post-conflict state, or experiencing weak or non-existing governance and systematic violations of international law, including human rights abuses, and which directly or indirectly finance or benefit armed groups in the DRC or any adjoining country ("**Conflict Minerals**").

The list of such countries includes the Democratic Republic of Congo ("DRC") or an adjoining country (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia).

The minerals currently included in the list of conflict minerals are cassiterite (tin), coltan (tantalum), wolframite (tungsten) and gold, as well as derivatives of these minerals. These are collectively referred to as "**3TG**".

2. **Scope**

The following Policy applies to all employees of Vesuvius plc and its subsidiary companies and suppliers.

3. Policy

<u>Product composition</u>: Vesuvius does not prohibit the uses of minerals identified in the designation of 3TG in the products it manufactures or third-party products that it sources. Vesuvius Prohibits the use of Conflict Minerals in its products and the products it sources from third parties

<u>Product and raw material sourcing</u>: Where Vesuvius does use the minerals identified in the designation of 3TG, or sources products that contain them, Vesuvius will only source such products or raw materials from certified conflict-free areas or suppliers.

<u>Suppliers</u>: Where appropriate, Vesuvius will periodically request from its suppliers any information it deems necessary, including certifications and documentation, to monitor and determine compliance with this policy, either directly or via an independent third-party. The Group will also consider, using a risk-based approach, the performance of independent third-party audits of suppliers to ensure compliance with this policy.

<u>Continuing review</u>: Vesuvius will continue to review developments in the designation of products as Conflict Minerals and apply this policy to the uses and sourcing of any minerals so designated.

4. Compliance and oversight

The Group Executive Committee have oversight over this policy, working with the company's internal and external legal counsel as required.

Vesuvius will routinely verify that no conflict minerals are purchased by its operations.