



AVON METALS LTD STATEMENT ON CONFLICT MINERALS

Avon Metals Ltd (AML) is a UK based recycler of base metals, Aluminium, Copper, Nickel and Cobalt alloys. Our company handles 1) Secondary(scrap) 2) recycled products made exclusively from scrap 3) primary products from approved suppliers. Our company does not handle any minerals or ores and as such is not involved in materials subject to Class 7 Transportation Regulations. Our company **DOES NOT** currently add Tantalum, Tungsten, Tin or Gold to any of its products. We condemn the unlawful exploitation of mineral resources from any locations in the world and we fully support the goal of ending violence, human rights violations, and environmental devastation in the Democratic Republic of the Congo (DRC), and its surrounding countries – known as the “Conflict Region”. Whilst none of our supply chain originates from the DRC or the surrounding region, we are firmly committed to supporting a **Conflict-Free** not **Congo-free** supply chain. As part of this commitment we have adopted a continuous improvement policy within our own organisation to only purchase materials that are guaranteed to be conflict-free and that meet all the relevant criteria stipulated by the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We acknowledge the final “Conflict Minerals Rule” issued by the U.S. Securities and Exchange Commission (“SEC”) issued under Section 1502 of the 2012 Dodd-Frank Wall Street Reform and Consumer Protection Act and we are committed to assisting our customers with their due diligence and disclosure requirements required to comply with the legislation.

Additionally, AML’s Shareholders are active voluntary supporters of the following initiatives and organisations – Responsible Minerals Initiative (RMI), United Nations Global Compact, World Economic Forum (Partnership Against Corruption), Global Reporting Initiative (GRI), Minor Metals Trade Association (MMTA), Tantalum Niobium International Study Centre (TIC).

In support of our Conflict Minerals Sourcing Policy, AML undertakes to: -

Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and encourage our suppliers in turn roll this out to their suppliers.

Incorporate the principles of this Policy into our legally binding Purchase Contracts and monitor all transactions.

Provide, and expect our suppliers to co-operate in providing, due diligence information to confirm that any metals in our supply chain are conflict free.

Voluntarily exercise the same due diligence for other metals out of scope - such as Cobalt, Niobium and any others which we become aware of having such issues.

Collaborate with our suppliers and others on industry-wide solutions to enable products that are conflict-free.

Publicly communicate our policy and progress via our corporate website, annual Corporate Responsibility Report and Supplier Code of Conduct.

Strive to assist our customers and supply chain partners in implementing their own conflict minerals compliance programs. AML seeks to establish long-term relationships and work with suppliers to drive meaningful, lasting and sustainable improvements. Where risks in our supply chain are identified we will work with suppliers to assess and mitigate these risks in accordance with OECD Guidelines, and in particular “Annex II: Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas”. We will cease trade relationships with any suppliers who are found to be in deliberate or persistent breach of our Sourcing Policy and OECD Guidelines.

Grievance Mechanism & Reporting

This Policy will be reviewed regularly and updated as required. Concerns regarding the content or execution of this Policy can be reported directly to AML’s Board of Directors through our official grievance channels: - Email: info@avonmetals.com or alternatively please call: + 44 1452 874500 (UK)

Signed

Richard McAlister-Martin, Technical and Compliance Director

Dec 2017