



CONFLICT MINERAL STATEMENT

Tungsten, tantalum, tin (and the ores from which they originate) and gold are considered “conflict minerals” under the U.S. Dodd-Frank Act (Dodd-Frank Wall Street Reform and Consumer Protection Act, passed by U.S. Congress in 2010).

Section 1502 of the Dodd-Frank Act obliges companies filing reports with the U.S. SEC to disclose the conflict minerals contained in the products they manufacture or contract to manufacture, where such minerals are "necessary to the functionality or production" of the products. Holmes Circuit Designs Limited (“HCD”) do not file reports to the SEC and have no legislative obligation to comply with the conflict minerals requirements of the Dodd-Frank Act.

The European Parliament and Council have on 17 May 2017 passed the EU Regulation 2017/821 laying down supply chain due diligence obligations for EU importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas. As HCD does not import such minerals or metals to the EU as such, the mandatory supply chain due diligence requirements of the Regulation do not apply to HCD.

However, HCD acknowledges the importance of the issue and engages in ongoing and close dialogue with its suppliers about sustainable business practices and transparency of material use. We require all of our suppliers to comply with all applicable laws and regulations, commitment to ethical conduct and respect for human rights in the spirit of internationally recognised standards. We also require our suppliers to provide documentation declaring the materials, chemicals and components used in the purchased products and their production process. HCD is committed to continue to work closely with our suppliers, customers and other stakeholders to secure and enhance good practices and establish feasible solutions on this very important issue.

A handwritten signature in black ink, appearing to read 'Gene Holmes', is positioned above the printed name.

Gene Holmes – Director

August 2022