

Benoil Services Limited

Conflict Minerals Policy

1. INTRODUCTION

- 1.1 Benoil Services Limited ("Benoil") and its affiliates together ("the Company") are committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.
- 1.2 The US Government, through the Dodd-Frank Consumer Protection Act, has highlighted the issue of Conflict Minerals. Our clients include several US headquartered businesses and they are placing increasing focus on their suppliers to ensure that they do not use Conflict Minerals.
- 1.3 The Company is committed to the highest standards of ethical behaviour and we believe that ensuring our products do not contain Conflict Minerals is important.
- 1.4 This policy has been approved by the Board and has been communicated to everyone involved in our business to ensure that all our staff are fully committed to its implementation.

2. CONFLICT MINERALS

- 2.1 Conflict Minerals are defined as any minerals being used to fund conflict in the Democratic Republic of Congo or neighbouring countries.
- 2.2 The most common conflict minerals are as follows:
 - 2.2.1 Columbite Tantalite – known as Coltan – from which Tantalum is derived
 - 2.2.2 Cassiterite - Tin
 - 2.2.3 Gold
 - 2.2.4 Wolframite - Tungsten
- 2.3 Over 5.4 Million people have died in the Congo in this Civil Conflict.
- 2.4 The mining of conflict minerals is based upon violence and threats, people hired at gunpoint and forced to work. 75% of the money used to finance the conflict is from this mining.
- 2.5 The Dodd-Frank Act has successfully reduced militia income by 65%.

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3. THE COMPANY POLICY STATEMENT

- 3.1 The Company recognises the importance of not using Conflict Minerals.
- 3.2 The Company does not purchase any of these minerals directly and therefore has never knowingly dealt directly in Conflict Minerals.
- 3.3 The Company recognises that the above minerals may be used in several alloys, often in very small amounts, which may be used to make components sold by some companies.
- 3.4 The Company may seek confirmation from its key suppliers that to the best of their knowledge their products do not contain Conflict Minerals.

4. RESPONSIBILITY FOR COMPLIANCE AND SCOPE OF POLICY

- 4.1 This policy is part of our suite of Ethical Business Practices policies and has been approved by the Board.

This policy has been approved & authorised by:

Name: Matt Anstead
Position: Managing Director
Date: 5th December 2025
Signature:

