



## Conflict Minerals Declaration

Dear Valued Customer,

### **Commitment**

RS Group, plc. is committed to support responsible sourcing practices. We share the same expectation with all our stakeholders, which is evidenced by our Conflict Minerals and Materials of Concern Policy 2022 ([RSGroup-Conflict-Minerals-and-Materials-of-Concern-Policy-2022\\_Sept.pdf](#)). RS Group, plc. maintains a robust Conflict Minerals Reporting Template 'CMRT' data gathering process; as such, we aim to proactively identify risks and progressively eliminate those with concern to our supply chain. RS Group, plc. conducts risk mitigation and due diligence appropriate to the nature of the risks as it pertains to our products, suppliers, or services.

### **Due Diligence**

In alignment with our Conflict Minerals and Materials of Concern Policy 2022, RS Group, plc. continuously surveys its direct suppliers by gathering and assessing current version CMRT.

The goal of the risk-based due diligence approach described above is to:

1. Educate the supply chain of current risks and concerns.
2. Support informed purchasing behaviors throughout the supply chain.

### **Disclaimer**

RS Group plc and its entities do not purchase minerals directly from mines, smelters, or refiners. Given the fact RS Group, plc. is layers removed from upstream stakeholders, it is difficult to effectively influence their purchasing behaviors, especially within a short period of time. In addition, RS Group, plc. and its entities do not influence the design, production and/or material sourcing of any product. Therefore, RS Group, plc. and its entities are not defined as a 'manufacturer' or a 'contract manufacturer' as defined under the Dodd Frank act 2010 under section 1502 outlined below.

**RS**

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**Contracting to Manufacture:**

*A company is considered to be “contracting to manufacture” a product if it has some actual influence over the manufacturing of that product. This determination is based on facts and circumstances, taking into account the degree of influence a company exercises over the product’s manufacturing.*

*A company is not deemed to have influence over the manufacturing if it merely:*

- Affixes its brand, marks, logo, or label to a generic product manufactured by a third party.*
- Services, maintains, or repairs a product manufactured by a third party.*
- Specifies or negotiates contractual terms with a manufacturer that do not directly relate to the manufacturing of the product.*

*The requirements apply equally to domestic and foreign issuers.*

Declarations (CMRTs) look retrospectively at procurement; so, at the time a CMRT is provided, material from smelters may already be part of the company’s supply chain and products. Therefore, actions requesting immediate removal (stopping the use of material from a smelter) of a smelter of concern cannot always be fulfilled.

For additional information contact us directly via this e-mail address: [QC@na.rsgroup.com](mailto:QC@na.rsgroup.com)

Thank you,

David L. King  
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