



**INDUSTRIAL METALS  
INTERNATIONAL LTD.**

## **Industrial Metals International Ltd. Conflict Minerals Policy**

Updated January 20, 2023

Industrial Metals International Ltd. (IML) is committed to sourcing products, components and materials (hereafter referred to as “products”) from third party vendors that share our values concerning human rights, ethics, and corporate social responsibility.

IML condemns the ongoing violence and humanitarian crisis in the Democratic Republic of Congo (DRC) and adjoining countries, financed partly by the trade of minerals referred to as ‘conflict minerals’ (tin, tantalum, tungsten and gold).

These minerals can make their way into the supply chains of various products used by consumers and businesses around the world. As a publicly traded company and downstream user of products that could potentially contain conflict minerals, Hasbro is required to comply with U. S. Securities and Exchange commission (SEC) conflict minerals rule.

This policy is intended to reinforce IML’s commitment to responsible sourcing and to inform our vendors of IML’s requirement that products shipped from IML will be conflict free. IML’s policy does not preclude our vendors from sourcing certified conflict-free minerals from the DRC and adjoining countries.

### **Key Requirements:**

IML requires all vendors who produce products for IML that are likely to contain conflict minerals (tin, tantalum, tungsten and gold) to comply with the following requirements:

- IML requires its suppliers to respond to conflict minerals surveys and related inquiries from IML in a timely and accurate manner. IML conflict minerals surveys require suppliers to provide declarations about the source and origin of the conflict minerals in the products they supplied to IML.
- IML requires its third party vendors to report smelters. The conflict minerals survey from Hasbro will have the provision to provide a list of smelters where the conflict minerals contained in the products supplied to IML were processed, if known.

# IML

## INDUSTRIAL METALS INTERNATIONAL LTD.

- IML requires its third party vendors to source from conflict free smelters in support of IML's conflict minerals goal.
- Both the Responsible Minerals Assurance Program (RMAP) and the London Bullion Market Association (LBMA) publish lists of acceptable smelters. IML requires a vendor to select a smelter from one of these two lists.
- If a vendor is not sourcing from Conflict Free smelters, designated as conflict free by a third party auditor such as the Responsible Minerals Initiative (RMI), London Bullion Market Association, or any other recognized equivalent, the supplier must immediately begin working with RMI or LBMA to transition to, or validate, that Conflict Free Smelter(s) is/are the sole source of conflict minerals.

IML reserves the right to require additional documentation to verify the conflict minerals used and source of the conflict minerals contained in the products supplied to Hasbro.