



Black Diamond
BD Drill Drilling Services Australia



Black Diamond Drilling Services Conflict Minerals Policy

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1 Purpose

Black Diamond Drilling Services is committed to maintaining transparency and integrity in its mineral sourcing practices. This policy outlines the company's efforts to ensure that its sourcing of tin, tungsten, tantalum, and gold (3TG) does not contribute to conflicts, violence, or human rights abuses. Black Diamond Drilling Services aims to adhere to applicable legal requirements while ensuring responsible and ethical sourcing of minerals.

2 Scope

This policy applies to the sourcing of 3TG minerals that may be used in products or components of Black Diamond Drilling Services and that may originate from conflict-affected or high-risk areas. This includes suppliers of 3TG above the applicable volume threshold as defined by relevant laws and regulations.

3 Definition

Conflict minerals refer to minerals such as tin, tungsten, tantalum, and gold (3TG) that may originate from regions affected by conflict or human rights abuses. These minerals are covered under this policy when they meet the relevant volume thresholds as prescribed by law. Minerals from recycled or scrap sources are considered conflict-free.

4 Responsibility

A senior management representative will oversee the supply chain due diligence process, ensuring compliance with relevant regulations. All records related to the due diligence efforts will be maintained for a minimum of five years.

Due Diligence Process for Sourcing 3TG

- **Supplier Communication:** Suppliers will be informed about the policy and the requirement to comply with Black Diamond Drilling Services' conflict minerals due diligence procedures. A standard letter outlining the policy and potential future due diligence requests will be provided.
- **Identification of 3TG Imports:** Any imports of 3TG that exceed the threshold volume as specified by the applicable law will be identified and reviewed for compliance.
- **Due Diligence Review:** A thorough due diligence review will be conducted, including the collection of information from suppliers on the origin of the 3TG and the smelters involved. Suppliers will be required to complete the Conflict Minerals Reporting Template (CMRT), and responses will be evaluated against Black Diamond Drilling Services' criteria.



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- Risk Mitigation: If risks related to the sourcing of 3TG are identified, Black Diamond Drilling Services will work with suppliers to mitigate the risks. In cases where risks cannot be mitigated, the company may suspend or terminate business with the supplier.

Global Due Diligence Process for Sourcing 3TG

- Supplier Evaluation: Black Diamond Drilling Services will identify significant suppliers of 3TG materials and carry out due diligence by requesting them to complete the CMRT and provide information on the smelters used.
- Follow-up and Consolidation: Suppliers who have not provided sufficient information or do not meet Black Diamond Drilling Services' criteria will be followed up with. The responses will be consolidated and stored in the company's management system for future reference.
- Public Reporting: Black Diamond Drilling Services will publicly report on its conflict minerals sourcing practices on its website. This will include a summary of third-party audits and any actions taken in response to identified risks.

5 Compliance with Regulations

Black Diamond Drilling Services will comply with all applicable laws and regulations regarding the sourcing of conflict minerals, including the EU Regulation (EU) 2017/821 and the U.S. Dodd-Frank Act.