



Comar Group Ltd

Including

Comar Optics Ltd, Access Expeditions Ltd,
Grillo Group Ltd, Comar Investments Ltd

Conflict Minerals Policy

On July 21st 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into U.S. law. Section 1502 added Section 13(p) to the U.S. Securities Exchange Act of 1934. On August 22nd 2012, the U.S. Securities and Exchange Commission adopted the final rule requiring companies that manufacture or contract to manufacture products that contain Conflict Minerals including **Tantalum, Tin, Tungsten and Gold (3TG)** that are necessary to the functionality or production of a product manufactured to disclose annually whether any of those minerals originated in the Democratic Republic of the Congo or an adjoining country. The EU introduced legislation with similar aims in 2017.

The management and board of Comar Group Ltd (Comar) respect the aims of the Conflict Minerals initiative. Comar are not required by either the US or EU legislation to submit annual reports and the quantity of any Minerals used is far below the thresholds quoted in Annexe I of EU 2017/821. We understand, however, that a number of our customers are listed on the SEC and in Europe and we therefore have an obligation as part of the customers' supply chain to make best efforts to identify and disclose the use and origin of any Conflict Minerals that are necessary to the functionality or production of a product manufactured by or on behalf of Comar.

There are only a very small number of our products that we can identify as containing 3TG minerals "necessary to the functionality or production of the product" and the quantity of mineral involved would be very small indeed. These products would include the gold-plated mirrors and ITO coated windows. As we use such a tiny amount of these minerals we could not of course source directly from mines, smelters or refiners. We therefore regularly obtain declarations from all our suppliers that they are either not using Conflict Minerals or if they are that a full declaration form is submitted to confirm that no such minerals are sourced in breach of the Regulations.

Comar use the Conflict Minerals Reporting Template produced by the Responsible Minerals Initiative as part of the Due Diligence process used to verify the responsible sourcing of materials and to support our customer's compliance with the legislation.

Further information of the Initiative and copies of the template are available at <http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template>