



Policy Conflict Minerals

Trans Construction AS (ATC) strives to be a good corporate citizen. We are committed to ensuring the health, safety and protection of people who come into contact with our products and business. We require high social, environmental and human rights standards among our suppliers. Managing our obligations in relation to Conflict Minerals is a part of this corporate responsibility.

ATC is committed to:

- Identifying which ATC products are impacted and targeting our efforts accordingly
- Not buying products and materials containing Conflict Minerals directly from Conflict Mines
- Working with our suppliers to ensure that any Conflict Minerals contained in the products and materials supplied to ATC originate from Conflict Free sources
- Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals

In addition, we are committed to engaging with our customers regarding their disclosure obligations.

Background

In August 2012, the United States Securities and Exchange Commission (SEC) issued its final rules regarding Conflict Minerals (known as '3TG' – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Act). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the Act.

Signed on behalf of Trans Construction AS

Date: 30.09.2016

Bjørn Tømte
Managing Director