



SGA Technologies position in the use of “Conflict” Materials

SGA are increasingly being asked for details of our status in regard to “conflict materials” and we have therefore sought clarification from our suppliers.

We currently purchase our gold material from Atotech. Atotech have provided us with a statement listing all of the materials that we have purchased from them over the last year and detailing “conflict” status for each. Gold Potassium Cyanide is the only item listed as “Yes**” denoting that it comes under this banner of “conflict materials”. There is however a clarification note at the bottom of the document as follows;

*YES ** - gold potassium cyanide 68% (GPC) supplied by Atotech UK Ltd is purchased solely from Metalor who express their Compliance and Ethics in an online policy accessible on their website. After discussion with Metalor we are happy that they comply with the statement made by Atotech above.*

Metalor have the following statement on their website;

In 2010 Metalor became the first gold refiner worldwide to be audited and certified by the Corporate Social Responsibility Standard of the RJC at all of the Group’s refineries, and again in 2012 the first gold refiner worldwide to be audited and certified by the RJC Chain of Custody Standard, which includes conflict-related due diligence throughout the gold supply chain.

SGA believes that through these two documented statements that an ethical path for sourcing of gold materials can be clearly shown that meets the requirements of all relevant bodies relevant to our business and usage.

FAO. SGA Technologies Ltd

Presence of "Conflict" Materials

Atotech adheres to and embraces the ethical shared values and principle expressed in our Code of Conduct. As part of our Ethical Policy, Atotech strive to uphold the principles of the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the principles of the United Nations Global Compact. As an expression of these principles, and ethical values, Atotech adheres to the principle of responsible sourcing of precious and non-precious metals and metal salts in compliance with applicable laws and regulations.

Conflict Materials

Atotech procures the metal and metal salts used in its products from leading manufacturers/suppliers, who confirm their adherence with the principles of responsible sourcing and procurement and compliance with applicable laws and regulations. The majority of these materials are recovered by recycling of secondary materials, so it is not possible to trace the country of origin of the source metal ore. In addition, the majority of these products are manufactured/prepared at sites within the European Union. We hope that you can appreciate the complexities involved in these supply chains and would appreciate your understanding in this matter.

For materials recently purchased by your company:

Product Name	Tungsten (W)	Tin (Sn)	Tantalum (Ta)	Gold (Au)
ADDITIVE ALKALI A	No	No	No	No
ALKAVATE 358	No	No	No	No
ALKLEAN A11	No	No	No	No
ALUM-ETCH NN	No	No	No	No
ALUMSEAL NCY X2	No	No	No	No
AUNIC EN A	No	No	No	No
AUNIC EN B	No	No	No	No
AUNIC EN C	No	No	No	No
AUNIC EN MAKE-UP	No	No	No	No
AUROTECH ACTIVATOR 1000 CONC	No	No	No	No
AUROTECH SF PLUS MAKE-UP	No	No	No	No
AUROTECH SF PLUS REPLENISHER	No	No	No	No
BORIC ACID GRANULAR	No	No	No	No
COPPER CYANIDE	No	No	No	No
COPPER PDO MINI 12MM*20M (25KG)	No	No	No	No
EN CORRECTION SOLUTION	No	No	No	No
FINE SILVER ANODE (12"x2"x1.6mm)	No	No	No	No
GOLD POTASSIUM CYANIDE 68,2 %	No	No	No	YES **
KLEER AID 5A (BD)	No	No	No	No

Product Name	Tungsten (W)	Tin (Sn)	Tantalum (Ta)	Gold (Au)
NEOCHEL 2	No	No	No	No
NICHEM 2700 A	No	No	No	No
NICHEM 2700 B	No	No	No	No
NICHEM 2700 C	No	No	No	No
NICHEM 5100 A	No	No	No	No
NICHEM 5100 B	No	No	No	No
NICHEM 5100 C AF (BD)	No	No	No	No
NICHEM PH CONTROLLER	No	No	No	No
NICKEL ANODES S PELLETS 6-14MM (50KG)	No	No	No	No
NICKEL CHLORIDE LIQUID (BD)	No	No	No	No
NICKEL SULPHATE LIQUID (BD)	No	No	No	No
OROSTRIP ADDITIVE	No	No	No	No
OROTECH N MAINTENANCE A	No	No	No	No
OROTECH N MAINTENANCE B	No	No	No	No
OROTECH N REPLENISHER	No	No	No	No
POTASSIUM CYANIDE	No	No	No	No
SILVER POTASSIUM CYANIDE 54.2%	No	No	No	No
SODIUM CYANIDE CYANOIDS	No	No	No	No
SODIUM CYANIDE POWDER, MIN. 96%	No	No	No	No
UNICLEAN 1020	No	No	No	No
UNICLEAN 675	No	No	No	No
WETTING AGENT NP-A	No	No	No	No

*Dave Hayward
on behalf of Atotech UK Ltd
23rd Nov 2012*

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METALOR ANNOUNCES INDUSTRY RECOGNITION BY RJC, LBMA, THE EICC® AND GESI

Neuchâtel (Switzerland), 05/10/2012.

Metalor Technologies, the first gold refiner worldwide to be audited and certified as socially responsible and conflict-free by the prestigious Responsible Jewellery Council (RJC), now also has the recognition of the London Bullion Market Association (LBMA) Responsible Gold Guidance and the Conflict-Free Smelter (CFS) Program developed jointly by the Electronic Industry Citizenship Coalition® and Global e-Sustainability Initiative. These worldwide industry organisations have successfully agreed to cross recognition of their programs, audits and certifications, with the formal announcement made on 17 September 2012.

These organisations have developed audit and certification programs to increase conflict-related due diligence and responsible practices in the gold supply chain. All three programs focus on independent third party audits of refiners' due diligence in conformance with the OECD Due Diligence Guidance and Gold Supplement, which recognise refiners as a key "choke point" in the gold supply chain.

In 2010 Metalor became the first gold refiner worldwide to be audited and certified by the Corporate Social Responsibility Standard of the RJC at all of the Group's refineries, and again in 2012 the first gold refiner worldwide to be audited and certified by the RJC Chain of Custody Standard, which includes conflict-related due diligence throughout the gold supply chain.

As the first RJC Chain of Custody (CoC) certified refiner in the world, Metalor is now listed on the CFS Program compliant refiner list. In addition, as a LBMA Good Delivery company, Metalor's RJC/CoC Certification is now accepted as conformant with the LBMA Responsible Gold Guidance requirements. This means a triple-approval-listing for all Metalor CoC Certified refineries (Switzerland, Hong Kong and the USA).

This triple recognition is particularly timely and important to manufacturers that are listed on United States stock exchanges and their gold supply chains. The U.S. Securities and Exchange Commission (SEC), in issuing final rules for Conflict Minerals (Dodd-Frank Section 1502) last month, also confirmed that manufacturers can meet US conflict gold requirements by sourcing gold through refiners who have been certified by OECD-consistent industry groups' conflict-free designation programs, such as the RJC, LBMA and CFS program. Metalor's three gold refineries directly satisfy the SEC rule.

Above and beyond these formal approvals, Metalor is the leading gold refiner worldwide for its efforts on conflict gold and improvement of artisanal mining. Over the past two years, Metalor took a leading role in the OECD Gold Supplement drafting committee, which created a worldwide due diligence guidance to avoid finance of conflict through gold transactions. In these efforts, Metalor has worked with governments, leading NGOs and industry associations to create guidance that is strong and effective. This guidance has now been widely endorsed.

The OECD has recognized the particular problems and concerns associated with artisanal gold mining, where many millions of poverty stricken people work, and strongly urged in its Gold Supplement that all participants work toward formalization and improvement of that sector. Metalor is the first refiner worldwide to respond to that request through the Swiss Better Gold Initiative.

This initiative combines the efforts of the governments of Peru and Switzerland, the RJC, Fairtrade/Fairmined, Metalor, and consumers of gold in Switzerland. The initiative's goal is to formalize a large community of artisanal miners in Peru, with guidance and standards for improved environmental and social working conditions and operations, and to bring that gold into the formal gold industry to concerned consumers in a sustainable way. The government of Switzerland considers this project to be a part of its humanitarian efforts in developing countries. Further to this, the Swiss Federal Department of Foreign Affairs recently invited Metalor, alone among gold refiners, to describe this project in a public forum on business and human rights. Metalor was proud to be recognized for its contribution of industry-leading efforts.

ABOUT THE EICC® (ELECTRONIC INDUSTRY CITIZENSHIP COALITION®)

The EICC® was established in 2004 to improve social, economic, and environmental conditions in the global electronic supply chain through use of a standardized code of conduct. The EICC® was incorporated in 2007 as an association to ensure greater awareness of the Code, and to expand its adoption across the industry. The EICC® includes over 70 global electronics companies. For more information or to view the EICC® Code of Conduct, see www.eicc.info or the latest EICC® annual report at http://eicc.info/documents/2011EICCANNUALREPORTFINAL_007.pdf.

ABOUT GLOBAL E-SUSTAINABILITY INITIATIVE (GESI)

The Global e-Sustainability Initiative (GeSI) is a strategic partnership of the Information and Communication Technology (ICT) sector and organisations committed to creating and promoting technologies and practices that foster economic, environmental and social sustainability. Formed in 2001, GeSI's vision is a sustainable world through responsible, ICT-enabled transformation. GeSI fosters global and open cooperation, informs the public of its members' voluntary actions to improve their sustainability performance, and promotes technologies that foster sustainable development. GeSI has 31 members representing leading companies and associations from the ICT sector. GeSI also partners with two UN organisations - the United Nations Environment Program (UNEP) and the International Telecommunications Union (ITU) - as well as a range of international stakeholders committed to ICT sustainability objectives. These partnerships help shape GeSI's global vision regarding the evolution of the ICT sector, and how it can best meet the challenges of sustainable development. For more information, see: www.gesi.org.

ABOUT THE LONDON BULLION MARKET ASSOCIATION (LBMA)

The LBMA is the international trade association that represents the market for gold and silver bullion, which is centred in London but has a global client base, including the majority of the central banks that hold gold, private sector investors, mining companies, producers, refiners and fabricators. The current membership includes 129 companies which are involved in the loco London bullion market, including trading houses, banks, refiners, miners and fabricators as well as those providing services to the market such as consultants, supervisors and assayers. The membership encompasses a total of 22 countries. The LBMA was formally incorporated in 1987 at the behest of the Bank of England to take over the roles previously played by two separate organisations, the London Gold Market and London Silver Market, whose origins go back to the mid-nineteenth century.

For more information about the LBMA, please visit :www.lbma.org.uk.

ABOUT RJC

The Responsible Jewellery Council is an international not-for-profit organisation bringing together more than 380 member companies. RJC and its Members are committed to promoting responsible ethical, human rights, social and environmental practices in a transparent and accountable manner throughout the jewellery industry from mine to retail. This commitment aims to reinforce consumer and stakeholder confidence in diamond, gold and platinum metals jewellery products. The RJC has developed the RJC Member Certification system which applies to all Members' businesses that contribute to the diamond, gold and platinum metals jewellery supply chain. All Certified Members of the RJC are audited by accredited, third party auditors to verify their conformance with the RJC's Code of Practices. A voluntary Chain-of-Custody Standard has also been developed for gold and platinum group metals. The RJC is a Full Member of the ISEAL Alliance – the global association for sustainability standards. For more information on RJC Members, Certification, and Standards please visit: www.responsiblejewellery.com .

ABOUT METALOR

Metalor is a leading participant in the field of precious metals and advanced materials. The focus of Metalor's business is precious metals. Metalor's core competencies are chemistry, metallurgy and management of precious metals. The main objective of Metalor consists of creating exceptional value for its customers, stakeholders and shareholders in a culture of performance, innovation, trust and respect. Metalor has customers on all continents in various industry sectors, from Swiss watch manufacturers to Brazilian electrical equipment suppliers. With subsidiaries all over the world and more than 1700 employees, the Metalor Group is present in Europe, in the United-States, in South-America as well as in Asia. In 2011, Metalor's net sales amounted CHF 389,9 million. For more information about Metalor, please visit: www.metalor.com.