



## Conflict Materials Policy

### Introduction

KE Group Ltd supports the ending of violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries.

As a result of this conflict, the U.S. Securities and Exchange Commission (SEC) has adopted rules to implement reporting and disclosure requirements related to “Conflict Materials”, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

The rules require manufacturers who file certain reports with the SEC, to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

### Definition

The definition of “conflict minerals” refers to gold, tin, tantalum and tungsten, the derivatives of cassiterite, columbite-tantalite and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future.

KE Group Ltd support these requirements to further the humanitarian goal of ending violent conflict in the DRC and in surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals”.

### KE Group’s Commitment

- To support the aims and objectives of the U.S. legislation on the supply of “conflict materials”;
- Not to knowingly procure the specified metals that originate from facilities in the “conflict region” that are not certified as “conflict free”;
- Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure the specified metals are being sourced only from mines and smelters outside the “conflict region” or have been certified as “conflict free” if sourced within the “conflict region”.

### Corrective Actions

If we discover the use of these minerals produced in facilities the are considered to be “non-conflict free”, in any material, part or component, we will take appropriate actions to convert the product to be “conflict free”.

Signed:

Two handwritten signatures in black ink, one appearing to be 'S. Ellis' and the other 'T. Smith', written over a horizontal line.

Date: 9<sup>th</sup> January 2014

Name: Stephen Ellis/Tim Smith

Position: Joint Managing Directors