

Conflict Minerals

(Only relevant for tin suppliers)

Already in 2012, the USA has defined the so-called "conflict minerals" as substances whose extraction may finance and promote military conflicts in different regions. In addition to serious political risks, such as corruption, further risks are posed by dangerous working conditions, inadequate social standards, and environmental violations.

Currently, tantalum, tin, tungsten, their ores (cassiterite, columbite-tantalite and wolframite) and gold, also known as "3TG", are considered as conflict minerals.

After the USA already passed the Dodd-Frank Act in 2010, the EU regulation on conflict minerals also came into force in January 2021. Both legal regulations apply to imports of 3TG's.

As an internationally operating company we always strive to fulfil our due diligence obligations along the supply chain and to comply with the applicable legal requirements. To minimize risks along our raw material supply chains, we use the risk-based management approach, which is based on the principles of the OECD Due Diligence Guidance for Responsible Supply Chains. In addition, we refer to the Conflict-Affected-High-Risk Area (CAHRA) list published by the European Commission, which we consider as a basis for our risk assessment (please refer to www.cahraslist.net).

We encourage all our business partners to also comply with the legal requirements applicable to them. In addition, we again expressly point out to comply with our minimum requirements defined in our Code of Conduct.

Suppliers who have either direct or indirect business in a sourcing country defined as CAHRA, or even maintain their own mining or processing sites in one of these countries, are classified as "high-risk".

However, we recognize the standards of the Responsible Mining Initiative (RMI) as acceptable. In the case that a direct or indirect supplier (smelter or refiner) is listed on one of the RMI "Active" or "Conformant" lists, it will be considered acceptable even if the supplier operates in a listed CAHRA. Based on this, we require all suppliers associated with the 3TG to provide appropriate evidence via the RMI's Conflict Minerals Reporting Template (CMRT).

Moreover, we reserve the right to conduct further verifications if the procurement process refers to 3TG's.

We appreciate your cooperation and thank you in advance for the fruitful business relationship.