

Conflict Minerals Policy

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Status:

Effective

Classification:

internal & external



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.

Our contribution

The brandgroup assumes its corporate responsibility and thereby creates the prerequisites for the sustained success of the company. In doing so, transparency is a decisive factor for trust and successful cooperation. Basis for this is the groupwide Code of Conduct and the Supplier Code of conduct.

While the brand group does not directly purchase those minerals from any source, we are aware about of the possibility that conflict minerals may be part of the supply chain. In recognition of this, we are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries.

Expectation

In order to support the brandgroup and its customers to comply with the applicable rules and regulations regarding conflict minerals also extended minerals and minerals that are not covered by CMRT & EMRT, we expects from our supplier to fulfill their due diligence obligations along the supply chain and to submit neassary reports, documentation or written assurances on request.

In detail it means following expectations towards suppliers:

- Report regarding the presence and source of minerals using the current Responsible Minerals Initiatives (RMI) Reporting Templates:
 - [Conflict Minerals Reporting Template \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org) (CMRT)
 - [Extended Minerals Reporting Template \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org) (EMRT)
 - [Pilot Reporting Template \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org) (PRT)
- Use smelters that have been declared conformant by the RMI audit protocols or cross-recognized audit partner protocols. RMI conformant smelters list can be found:
 - [Export - Smelter Reference Lists \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org)

The brandgroup proceeds a responsible pre-selection of suppliers. Is a supplier identified as a relevant, we insists to receive a response about using conflict minerals, without any exemptions. A missing answer from the supplier side may lead to further measures or even to a renunciation of the future cooperation.

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