

# Policy for Conflict Raw Materials

Version 1.0

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## Responsible raw materials sourcing – our contribution to promote global political stability and ethical standards

Sundwiger Messingwerk GmbH is a well-established and recognized company in the non-ferrous metals industry. With more than 300 years of business history we take our corporate responsibility serious and want to ensure transparency along our supply chain. The procurement of raw materials is done with consideration of their impact on ecological and social factors. In this context, Sundwiger Messingwerk GmbH demand that all our products and those of our suppliers are free from conflict minerals.

### What are 'conflict minerals'?

In politically unstable countries the trade of natural resources may lead to the promotion of corruption and human rights violations. It may also promote forced labour, money laundering or the financing of armed groups.

So far, tin, tungsten, tantalum (their ores) and gold are considered as "conflict minerals". They are also known as 3TG minerals.

### EU Conflict Minerals Regulation

The EU Conflict Minerals Regulation, also known as Regulation (EU) 2017/821, requires EU companies in the supply chain to ensure that they import 3TG minerals and metals only from responsible and conflict-free sources. The EU regulation is based on the due diligence guidelines of the OECD.

The regulation was signed into law in June 2017. The requirements for EU importers apply from 1 January 2021.

The regulation is the response to the US Dodd-Frank Act, which came into effect on August 22, 2012. It requires U.S.-listed companies to disclose whether their products contain 3TG minerals that originate from the conflict region of the Democratic Republic of the Congo (DRC)

or its neighboring states and to prove that they have been mined 'conflict-free'.

### Our Measures

To ensure that our company complies with applicable conflict minerals sourcing rules and regulations, our company established the following measures:

- Tin as raw material for the production of our copper based alloys as well as for the hot-dip-tinning process of our strip products is strictly procured from smelters and refineries that are listed on the conformant or active list of the Responsible Minerals Initiative (RMI). The RMI's Responsible Minerals Assurance Process provides companies with an independent third-party audit that determines which smelters and refiners can be verified to have adequate systems in place ensuring responsibly sourcing of minerals in line with current global standards.
- The origin of minerals applied in our processes is reported to our customers using the RMI Conflict Minerals Reporting Template (CMRT)
- Our suppliers are required to ensure that all products supplied to us contain materials from conflict-free sources
- All relevant suppliers are expected to provide the Conflict Minerals Reporting Template (CMRT)

**Thomas Berndt (CEO)**

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