

Conflict Minerals Policy

In response to violence and human rights violations in the mining of certain minerals from the “conflict region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries, the U.S. Securities and Exchange Commission (SEC) has adopted rules to implement reporting and disclosure requirements related to “conflict minerals”, as directed by the “Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502” of 2010. With the same minerals in scope and very much aligned to the US Dodd-Frank Act, the European Parliament and of the Council approved the “EU Regulation 2017/821” in 2017, which came into full force on January 1, 2021.

The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold.

We endeavor to not purchase any “conflict minerals” and do not knowingly procure any product containing “conflict minerals” from the “conflict region”.

To the extent that our products may contain “conflict minerals” that are necessary to the functionality or production of the product, we are committed to working with our direct suppliers to increase transparency regarding the origin and traceability of minerals contained in products. Due to the number of products we provide to our customers and the high complexity of the corresponding supply chains this will be a challenging and ongoing process.

If we become aware of a supplier whose supply chain includes metals from a conflict source, we will take the appropriate actions to remedy the situation in a timely manner.