

Statement on H.R. 4173 "Dodd-Frank Wall Street Reform and Consumer Protection Act" Section 1502 "Conflict Minerals" as well as EU-regulation 2017 / 821 Conflict Minerals in the EU

Dear Sirs,

Thank you for your inquiry regarding the obligations concerning the American bill H.R. 4173 "Dodd-Frank Wall Street Reform and Consumer Protection Act" Section 1502 on "Conflict Minerals" as well as the EU-regulation 2017 / 821 observe Conflict Minerals in the EU.

Our company is monitoring the American efforts to ban and observe monitor exploitation and trade with conflict minerals originating in the Democratic Republic of Congo and the adjoining countries very closely. This is also true for the implementation provisions as of August 2012. The application and commitment to observe and consider the EU regulation 2017 / 821 was checked by consulting our Chamber of Industry and Commerce. Considering all arguments and facts according to article 1, paragraph 2 and 3 and as well annex 1 we are not classified as direct importer.

As a German company we do not directly fall under the scope of application of both regulations. Nevertheless we pay very much attention to the national, European and international developments regarding ethical, social and environmental standards.

Therefore, we for the time being can assume that according to information available to us the material does not contain any of the defined "conflict minerals" like tin, tungsten, tantalum or gold from the Democratic Republic of Congo or its adjoining countries that in the meaning of the above regulations are necessary to the functionality or production of the products manufactures by us. Changes to our knowledge regarding this issue would surely be advised to you immediately.

With our best regards,

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