

CONFLICT MINERALS POLICY

We demand from our suppliers respect and compliance with existing legal requirements concerning the mining of raw materials in conflict and high risk territories – so called “conflict minerals” defined in respective EU-regulations. The classification “conflict minerals” includes, independently of their geographical origin, the minerals cassiterite, coltan, wolframite, and their derivatives tin, tantalum, tungsten, as well as gold (together known as 3TG). These raw materials are often mined with the risk of human rights abuses, as well as the risk that armed conflicts will be financed by the sale of these minerals.

ERNA-MAS does not directly source any of these minerals from mines in the high-risk territories or elsewhere, in fact the supply chain of these materials consists of many tiers. Before any product reaches our factories, the supply chain includes many stages including mines, smelters, traders, exporters, refiners, alloy producers and component manufacturers. Thus, ERNA-MAS supports the approach of validating smelters and refiners for 3TG, as they play a key role in the supply chain from the mining site to the final product. Within this approach, ERNA-MAS respects the OECD’s “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.” Considering these OECD principles, we ask our respective suppliers to report the origin and the certification status of the smelters and refiners involved. We regularly report the outcome of our data collection and analysis of the certification status. Relevant suppliers and sub-suppliers are asked to collaborate with smelters and refiners that are conformant with the Responsible Minerals Assurance Process (RMAP) by RMI. The RMAP identifies smelters and refiners that can verify that their raw materials do not originate from suppliers contributing to conflicts in the high-risk areas. We also highly encourage our suppliers to participate in the RMI or similar relevant industry initiatives with the intention to improve the conditions in the extractive industry.

Our suppliers declare that they comply with the amfori BSCI code of conduct. If necessary, ERNA-MAS demands full transparency of critical supply chains and reserves the right to assess or audit suppliers at risk.

With respect to further raw materials containing the potential for negative environmental and social impact, we are regularly monitoring related risks and counteract them accordingly, under consideration of the OECD guidelines and existing legal frameworks.

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