

Date: 20.07.2022

## Customer Information

**on the US Conflict Minerals Policy (US-CMP) and the EU Conflict Materials Regulation (EU)/2017/821 of Wachendorff Automation GmbH & CO KG and Wachendorff Prozesstechnik GmbH & Co. KG (hereinafter collectively referred to as "Wachendorff").**

The US Congress sees a direct link between the mining of and trade in tin, tungsten, tantalum and gold (conflict minerals) and human rights violations in the Democratic Republic of Congo and its neighbouring regions (hereinafter collectively referred to as DRC).

This is implemented in

- Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Section 1502 (HR4173))
- and in the EU Regulation Conflict Materials Supply Chain (EU)/2017/821 establishing supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict and high risk areas.

Wachendorff commits to act responsibly when sourcing conflict minerals for the manufacture of its products.

Wachendorff will therefore not knowingly support, abet or in any other way promote armed conflicts in the DRC through the mining of and trade in conflict minerals.

Wachendorff will not knowingly support in any way, directly or indirectly, non-state armed groups or militias that illegally collect taxes for or control mines, transport routes, trading points or actors in the upstream supply chain. Wachendorff has also developed comprehensive guidelines that strictly prohibit the involvement of its employees in any form of corruption or bribery. We expect all suppliers in our supply chain to follow these principles as well.

Wachendorff follows due diligence procedures in relation to conflict minerals in accordance with nationally and internationally recognised frameworks, some of which include the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Wachendorff also uses industry initiatives such as the Conflict Free Smelter Program (CFS) to ensure that conflict minerals used in the manufacture of our products come from conflict-free sources and do not contribute to armed conflict in the DRC. Suppliers are encouraged to source raw materials from conflict-free sources and, where possible, from certified smelters.

### **Requirements for suppliers**

Wherever possible, Wachendorff incorporates its principles on responsible sourcing of conflict minerals into the terms and conditions of contracts with suppliers and strives to create awareness of these issues within its supplier base. We present our position paper to our suppliers and expect them to establish similar guidelines in relation to their own supply chains.

Wachendorff encourages suppliers of components, parts or products that contain conflict minerals to source them from conflict-free sources. We expect our suppliers to establish their own conflict minerals sourcing policies, implement them and in turn communicate them to their own suppliers.

Whenever possible, they should also require their own suppliers to establish and implement similar guidelines. Wachendorff expects its suppliers, in cooperation with its own suppliers, to trace the origin of conflict minerals at least back to the smelter and encourages them to use a standard reporting process for this purpose. Wachendorff reserves the right to request further evidence from its suppliers on the origin and supply chain of conflict minerals, if necessary back to the mine where they were extracted. We expect suppliers to retain traceability evidence of this nature for five years and to provide it to Wachendorff upon request.

Suppliers are encouraged to support industry initiatives to improve the traceability of conflict minerals and responsible practices in their global supply chain.

Wachendorff strives to maintain long-term relationships with its suppliers, seeking sustainable solutions whenever possible and working with its suppliers to drive improvements.

Suppliers who fail to comply with Wachendorff's policies outlined herein must commit to a corrective action plan and implement it within a reasonable timeframe.

Wachendorff reserves the right to request evidence from its suppliers regarding the effectiveness of the corrective actions taken and to conduct an assessment of the supply chain. If a supplier persistently violates the guidelines and fails to implement corrective measures, this may lead to further measures up to and including termination of the business relationship.

If you have any questions, please contact [compliance@wachendorff.de](mailto:compliance@wachendorff.de)

Best regards

Christian Stingl

- Quality Management -