

Conflict Minerals Sourcing Policy



The US Dodd-Frank Act on the reform of US financial market law by improving accountability and transparency was signed by President Obama in July 2010. Section 1502 of the Act deals specifically with conflict materials from the Democratic Republic of Congo and its neighbouring countries and names tungsten, cassiterite, columbite tantalum (Coltan), gold and the metals tantalum, tin and tungsten derived therefrom.

The plan calls for companies that process these substances and are listed on the U. S. stock exchange to prove annually whether armed rebel groups are supported by the mining of the above-mentioned raw materials - if they are decisive for the production or function of the products. The companies concerned are obliged to disclose whether their products contain conflict materials and, if so, whether they come from the DRC or neighbouring countries.

We, Hans von Mangoldt GmbH (hereinafter referred to as Mangoldt) have no legal obligation to comply with the conflict minerals requirements of Section 1502 of the Dodd-Frank Act. However, we are aware of our social responsibility with regard to the environment, safety, health and human rights. We will not knowingly use conflict minerals from non-certified melts from the conflict region in our products. We help our clients meet their reporting obligations by providing relevant information.

We evaluate our supply chain for conflict minerals using the Conflict Minerals Reporting Template developed by the Conflict-Free Sourcing Initiative (CFSI) to identify the mineral's country of origin, as well as the iron and steel mills and refineries that have been supplied.

We ask our suppliers to purchase the 3TG material portion of the products they supply to us exclusively from conflict-free or certified smelters. Suppliers are also requested to provide us with the names of the smelteries via Conflict Minerals Reporting Template.

This policy is part of Mangoldt's purchasing policy.

Aachen, March 2022

Managing Director
Martin Schmalfuß

Managing Director
Dr. Christian Kaehler

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