

# WACKER'S POSITION ON "CONFLICT MINERALS"

In recent years the issue of conflict minerals mined in the Democratic Republic of Congo (DRC) and neighboring countries has become an increasing focus of international attention. Armed groups involved in the mining of mineral resources in this region are suspected of committing serious human rights violations against mine workers as well as local people. It is also believed that the profits from the sale of the minerals are used to finance regional conflicts.

## Four mineral types are in focus

According to the U.S. Securities and Exchange Commission's (SEC) Regulation 1502 listed companies using the minerals tantalum, tin, gold or tungsten must verify that they are not sourcing these minerals from conflict areas and must comply with a number of due diligence requirements as well as document their compliance. Similar regulatory content can also be found in EU Regulation 2017/82.

## Mining

We know that any mining of minerals can be associated with human rights violations. Therefore, we work intensively on all issues concerning raw materials from mines even if they are not mentioned in any law or other legally obligatory documents.

## Supply chains are complex

Since the international supply chain for these minerals is complex and the tracing to their extraction site involves many challenges WACKER must rely on its suppliers to identify the place of origin of conflict materials. The same applies to declaring the status of products that may contain conflict materials.

## We check our suppliers closely

We require our suppliers of raw materials containing tin, gold, tungsten and/or tantalum to confirm at least once a year that neither they themselves nor their sub-suppliers obtain these minerals from non-compliant sources. From our suppliers' feedback we have no indication that the tantalum, tin, tungsten or gold being delivered to WACKER in raw materials is sourced from non-compliant mines.

## Transparency at WACKER

For conflict minerals reporting we use the Conflict Minerals Reporting Template (CMRT) which we update at least once a year. The CMRT template is a standardized reporting template developed by the Conflict-Free Sourcing Initiative (CFSI) to facilitate the submission of information about the entire supply chain regarding the country of origin of materials and the smelters and refiners involved. The template also simplifies the identification of new smelters and finishers who will

potentially be audited through CFSI's Conflict-Free Smelter Program.

We provide our customers with the latest CMRT template upon their request.

## One step further ...

In addition to the currently defined conflict minerals tantalum, tin, gold or tungsten we regularly monitor other focus minerals and raw materials e.g. palm oil, mica, cobalt etc. with regard to due diligence in the supply chain.

## Further Information

[Current version of CMRT \(6.01\)](#)

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