

# **Conflict minerals / cobalt / mica Policy**

**Röchling Automotive Beteiligungs SE**  
Executive Board

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**EU Regulation 2017/821****U.S. "Dodd–Frank Wall Street Reform and Consumer Protection Act: Section 1502****CCCMC Clause 2.4.6****Dealing with disclosure requirements along the supply chain**

On August 22, 2012, the United States Securities and Exchange Commission ("SEC") issued definitive regulations on Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which requires companies to annually disclose the use of conflict minerals if those minerals are "necessary for the functionality or production of a product manufactured by these companies."

According to this law, publicly traded companies that manufacture or have manufactured products containing the following minerals (also referred to as 3TG) must declare their usage:

<b>Tin</b>	<b>Tantalum</b>	<b>Tungsten</b>	<b>Gold</b>
<b>and their derivatives</b>			

The aim of this Act as well as the EU Regulation and CCCMC Clause is to not obtain minerals mined in the Democratic Republic of the Congo (DRC) or in neighboring countries ("Covered Countries") and thus not to finance or promote violent conflicts.

**Cobalt** was added on December 21, 2018, as the trade in cobalt potentially involves human rights violations.

**Mica** was added on October 28, 2020, to prevent child labor.

In accordance with these regulations, Röchling will regularly check its own products for 3TG, cobalt and mica, and, if necessary, request from its direct (Tier 1) suppliers a declaration through a formal questionnaire. Röchling requires suppliers to determine whether the supplied materials and/or products contain 3TG products, cobalt and/or mica. Identification and disclosure of smelter and/or refinery locations (SORs) in the supply chain is required.

We expect our suppliers to:

- 1) implement policies and management systems to help meet these expectations
- 2) do their due diligence of the information retrieved to ensure that there are no sanctioned smelters and/or refineries in the supply chain
- 3) cooperate in the event of non-compliant information and investigate the reasons for the sanctions and replace the smelter/refinery concerned

Remark:

The Röchling Group does not act as a Union importer within the meaning of the EU Regulation; therefore, the Röchling Group is not subject to the reporting obligations of EU Regulation 2017/821 and the Dodd-Frank Act, but we are aware of the importance and significance of these guidelines and are subject to contractual and/or customer specific requirements and obligations.

Should we discover indications of the presence of the above substances in our raw materials and/or products during our investigations, we undertake to react in an appropriate manner and reserve the right to initiate the escalation process with the supplier.

Further information can be found on our website [www.roechling.com](http://www.roechling.com) and on the website of the [Conflict-Free Sourcing Initiative \(CFSI\)](#).

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