

Guidelines for Conflict Minerals

The mining of certain raw materials in the Democratic Republic of the Congo (DRC) and bordering states partly contributes to significant human rights abuses and to the financing of violent conflicts in this region. Industries using minerals, which are mined in the conflict regions, have a special responsibility to verify where the minerals they process originate.

In 2010, the US-American congress passed a law with the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, which requires a company under the control of the SEC-authority (U.S. Securities and Exchange Commission), to produce a report to what extent the products produced or ordered by them contain so-called "Conflict Minerals", which are "necessary for the functionality or production" of such products.

SHS – Stahl-Holding-Saar and its associated concerns are not listed on US stock exchanges and are thus not legally obliged to meet the reporting requirements of the US stock exchange authorities.

Nevertheless, we consider the subject of "Conflict Minerals" with great care and ensure, as far as possible, that no material is procured from conflict countries which finance or support armed groups directly or indirectly (e.g. in the Democratic Republic of the Congo or bordering states such as Central African Republic, Sudan, Ruanda, Burundi, Tanzania or Zambia). Appropriate processes were established for a monitoring analysis, such as for example querying the smelter ID per RMI.

Equally, we meet the requirements of the provision (EU) 2017/821, which determines the duties of fulfilling due diligence obligations in the supply chain in the respective applicable version.

We expect verification from our suppliers that they procure or process DRC conflict-free raw materials. In our supplier questionnaire, we refer to the conflict-free procurement of raw materials, evaluate the same and initiate measures for continuous improvement.

Furthermore, acting in accordance with this guideline is also integrated into our code of conduct.