

US Conflict Minerals Policy

The United States Congress has associated the extraction and trade of tin, tungsten, tantalum, and gold (Conflict Minerals) with human rights violations in the Democratic Republic of the Congo and adjoining countries (collectively, the DRC). ESCHA GmbH & Co. KG (hereinafter ESCHA) is committed to the responsible sourcing of Conflict Minerals used in our products. With regard to the extraction and trade of Conflict Minerals, ESCHA will not knowingly provide support to, contribute to, assist with, or facilitate armed conflict in the DRC.

ESCHA will not knowingly provide any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. Similarly, ESCHA has a comprehensive policy that prohibits its employees from engaging in corruption and bribery. We expect the parties in our supply chain to follow the same principles.

ESCHA will follow due diligence procedures relating to Conflict Minerals which are consistent with a nationally or internationally recognized due diligence framework which may include the OECD «Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas».

ESCHA will also rely on industry initiatives, such as the «Conflict Free Smelter Program» (CFS) in our efforts to validate that the Conflict Minerals used in our products are not facilitating armed conflict in the DRC and come from conflict-free sources. Suppliers are encouraged to procure materials through conflict free sources and, when reasonably feasible, through validated smelters.

Supplier requirements

Where possible, ESCHA will incorporate the principles of responsible sourcing of Conflict Minerals into our contract terms with suppliers and will work with our suppliers to create awareness of these issues within our supply base. We will make our position statement available to our suppliers and expect them to adopt similar positions or policies with respect to their own supply chains.

ESCHA encourages its suppliers that manufacture components, parts, or products containing Conflict Minerals to procure those materials from conflict-free sources. We expect our suppliers to adopt, implement and communicate to sub-suppliers their positions and policies regarding Conflict Minerals, and where possible, require their down-stream suppliers to adopt and implement similar positions and policies. ESCHA's suppliers are expected to work with sub-suppliers to trace conflict materials at least to the smelter level and encourage the use of a standard reporting process. ESCHA reserves the right to request its suppliers provide further evidence of their conflict mineral supply chain, including down to the mine level, if necessary. We expect suppliers to maintain such traceability data for five years and provide this information to ESCHA upon request. Suppliers are encouraged to support industry efforts to enhance traceability of Conflict Minerals and responsible practices in their global supply chains.

ESCHA's approach is to establish long-term relationships with suppliers and, when feasible, to seek sustainable solutions while working with suppliers to drive improvements. Suppliers acting contrary to ESCHA's position described herein must commit to and implement a corrective action plan within a reasonable timeline. ESCHA reserves the right to require suppliers to provide support for the effectiveness of such corrective actions and to conduct supply chain assessments. A supplier's continued non-conformance and failure to take corrective actions may lead to additional actions, up to and including termination of the business relationship.

Kind regards from Halver

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Compliance Officer

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