

Due Diligence Report on Conflict Minerals 2021

General

IMR Metal Powder Technologies GmbH (IMR) is a privately owned enterprise that operates as a member of the holding of the IMR Group© and is a successful participant in the international non-ferrous metal market.

The point of contact with the obligations regulated by EU Regulation 2017 / 821 with regard to the conflict metals tin, tantalum, tungsten and gold is exclusively tin metal, which is imported into the European Union, processed and resold by IMR.

Measures derived and implemented from the strategy for fulfilling the statutory duty of care

- IMR has established and publicly communicated a supply chain policy that unequivocally states that only conflict-free tin raw materials are sourced and processed.
The basic standards for this policy correspond to the model strategy in Appendix II of the OECD Due Diligence Guidance.
- The internal management system has been structured in such a way that the required due diligence can be fulfilled.
- Contracts and agreements with suppliers are concluded in accordance with the supply chain policy and suppliers are selected based on ethical and code-of-conduct requirements.
- IMR strives to identify risks in supply chains as quickly as possible in order to be able to initiate appropriate measures. To this end, IMR regularly takes part in international specialist conferences in the area of the tin metal supply chain to obtain specific information and maintains regular contact with associations (such as the ITRI - International Tin Association) and market participants.
- Stakeholders are encouraged to contact us with concerns about our supply chain. Corresponding contact details for this are communicated on the company's website.
- IMR stores fully traceable records of all tin metal purchases and archives them in accordance with its internal business transaction record management system.
- Risks of adverse supply chain effects are systematically identified, assessed and communicated to senior management for decision-making.

Due Diligence Report on Conflict Minerals 2021

- The risk analysis is an integral part of defining the conflict minerals due diligence strategy and is regularly reassessed.
- IMR undergoes an independent, third-party audit that includes the activities, processes and systems designed to ensure due diligence is performed. The test result for the previous year is communicated publicly.

Further steps to reduce risk

IMR is clearly opposed to any business that directly or indirectly funds or benefits armed groups and/or is associated with other serious human rights violations in high-risk and conflict regions.

Codes of ethics and conduct are becoming increasingly important in the industry and IMR will take further measures in its management system to create awareness of responsibilities among all those involved in the supply chain.

Lind / Velden, May 2022