

# Steelcomp Group Policy on Conflict Minerals

## **General Operating Model**

In everyday activities, we pay attention to our responsibility towards changes occurring in the world. As a company we strive to react on those, for example by doing a research and evaluating our suppliers operating models and background information, both in terms of law and ethics. Customer's special requirements are also taken into account.

Our company doesn't want to cooperate with suppliers who don't follow laws of the country or have been declared disreputable supplier due to unethical reasons. If we notice defects in our suppliers operating model, we will intervene to the situation by doing research or changing the supplier. Our company doesn't accept child labour, human trafficking, violation of human rights or forced labour, neither business, which finances violence and armed conflicts, for example in the Democratic Republic of the Congo area.

Conflict minerals, (tin, tantalum, tungsten and gold) we strive to purchase only from suppliers who purchase their ores from mines belonging to the accepted CFSI / CFSP list.

## **Internal controlling**

Meaning of the internal control is to inform our own staff about company's operating practices in relation to conflict minerals (CMR). Furthermore, in order to make them understand the reasons of these practices and following development activities.

All employees working in purchasing are trained correctly to instruct existing suppliers and when choosing new supplier or partner.

## **Supplier guidance**

We urge our suppliers to follow their own mineral supply chains with reasonable care in the procurement of ore, especially when purchasing from contradictory and risky areas.

We tell them about our responsibility regarding purchase and use of ore, and the requirements towards suppliers.

From all suppliers, we demand clarification of country origin for gold, tin, tantalum and tungsten. Clarification of country origin is also required for further processed products. If a supplier doesn't have needed documents to clarify origin or ore comes from non-approvable area, we will intervene situation by giving supplier an opportunity to develop practices by finding new ore supplier in CMR-clean area. Alternatively, we refuse to use the supplier for that material or product.