

Conflict minerals policy SumiRiko AVS in Europe



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Introduction

The U.S. Securities and Exchange Commission (SEC) adopted final rules to implement reporting and disclosure requirements related to Conflict Minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

The provision was included in the Dodd-Frank Act to further the humanitarian goal of ending violent conflict in Democratic Republic of Congo (DRC) and adjoining countries, which has been partially financed by the trade of certain minerals, known as Conflict Minerals.

In May 2017, the European Union adopted Regulation (EU) 2017/821. The Regulation establishes supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores and gold from conflict-affected and high-risk areas.

This Regulation is based on the OECD Due Diligence Guidance and aims to enable the creation of secure, transparent, and verifiable mineral supply chains while facilitating and promoting the responsible import into the EU of minerals and metals from conflict and high-risk areas, without contributing to the armed conflicts or human rights abuses often associated with their exploitation.

The Conflict Minerals Regulation 2017/821 covers only imports of tin, tantalum, and tungsten, their ores and gold as they are among the minerals most frequently linked to armed conflicts causing serious and persistent humanitarian crises.

In addition to the regulation, the SumiRiko AVS Group aims to phase out dependence on materials and substances of concern and to drive more sustainable products from the supply chain. It therefore extends the listing to Cobalt and mica.

Conflict minerals policy

Goal and commitment

In accordance with the ethical codes of Sumitomo Riko's philosophy and the pillars of corporate Social Responsibility, we seek to avoid the intentional use of Conflict Minerals from sources that support or finance the inhumane treatment of workers, including human smuggling, human trafficking, slavery, forced labour, child labour, torture, and war crimes.

It is therefore committed to using and extending over its supply chain more sustainable materials and substances not only with respect to the environment but also with respect to Human Rights.

SumiRiko AVS Holding Germany GmbH

The Sumitomo Riko Group CSR Concept identifies six fields of activity:



To achieve these sustainability commitments by eliminating materials of dubious origin, several actions are carried out,

- Adopt and enforce this Conflict Minerals Policy in all Group companies.
- Extend this Policy to its supply chain.
- Request information on Conflict Minerals from suppliers that may be affected by this Policy,
- Periodically monitor and supervise compliance with this policy.

Extension to the supply chain.

SumiRiko AVS Group expects suppliers to comply with legal requirements, to be involved and to extend these sustainability commitments to their suppliers as well.

To improve transparency about the provenance of such minerals in our value chain, the supplier is required to

- Conflict Minerals Reporting Template Responsible Minerals Initiative CRMT certificate, developed by Responsible Minerals Initiative (RMI)
- Extended Mineral Reporting Template (EMRT) developed by Responsible Minerals Initiative (RMI)
- Information updated annually
- Provide SumiRiko AVS Group with any additional information upon request