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## To whom it may concern

Schwäbisch Hall, 11<sup>th</sup> of December 2023

## Conflict Minerals Declaration

Dear Sir or Madam,

The US Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act") is legally binding since July 2010 and in section 1502 it explicitly addresses the mining and use of the so-called Conflict Minerals, namely the "3TG" Tin, Tantalum, Tungsten, Gold and their *derivatives*. The law aims at preventing or reducing armed conflicts and crisis situations. Conflict Minerals can be extracted at many different places around the globe, especially in the Democratic Republic of Congo (DRC) and its adjoining countries Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia. The US Securities and Exchange Commission's (SEC) rules define Conflict Minerals as „3TG“, wherever extracted. However, according to the SEC rule, minerals are only "DRC conflict-free" when their extraction does not directly or indirectly benefit armed groups in the covered countries. **However, STEGO is not subject to disclosure and reporting requirements in this context, as it is not a company listed with the SEC and is therefore not bound by this law.** Nonetheless, we take this very seriously in relation to every possible impact on the electronics supply chain that supports our manufacturing. The internationally recognized *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* ("CAHRA" → <https://www.cahaslist.net/>) has a broader scope and covers *all* minerals, so, not only the "3TG". With the Official Journal of the European Union on the 19<sup>th</sup> of May 2017, the Regulation (EU) 2017/821 was published, laying down the duties of EU importers to fulfill the due diligence accountabilities in the supply chain of certain minerals and metals from those Conflict-Affected and High-Risk Areas. In fact, since 1<sup>st</sup> of January 2021, those duties for EU importers, stipulated in Articles 3 Paragraphs 1, 2, 4 to 7 of this Regulation (obligations in relation to the management system, risk management and for carrying out audits by third parties as well as disclosure obligations) are applicable. In accordance with our sense of responsibility for the environment, safety, health and human rights as well as for the purpose of fulfilling the due diligence duties, we are in communication with our suppliers and also evaluate them with regard to possible sources of delivery from those Conflict-Affected and High-Risk Areas. Despite the difficult traceability (from the smelter to the finished end product, there are up to 20 processing steps), we have received feedback from our suppliers which states that, *so far, knowingly*, minerals from non-certified smelters or refineries in the above-mentioned regions are *not* obtained for our products. Furthermore, STEGO has joined the "Verband der Elektro- und Digitalindustrie ZVEI e. V." in its Conflict Minerals campaign.

We provide our information "AS IS", without any express or implied warranties of any kind.  
Do not hesitate to contact us in case of remaining questions.

Best Regards,

STEGO Elektrotechnik GmbH

  
Elmar Mangold  
CEO