

## Statement on the **EU Conflict Minerals Regulation** and on the **Dodd-Frank Act**

Dear Sir/Madam,

Thank you for your interest in our products and your enquiry regarding the **EU Conflict Minerals Regulation**<sup>1</sup> and **Dodd-Frank Act**.<sup>2</sup>

The **EU Conflict Minerals Regulation** is specifically directed at Union importers<sup>3</sup> of minerals and metals. Blum-Novotest GmbH is not a Union importer of minerals and metals, the so-called conflict minerals, and is therefore not directly affected by Regulation (EU) 2017/821.

We neither process nor sell raw materials. To manufacture our products, we only use processed metals and metal alloys in the form of semi-finished materials, individual components and modules.

As a German company, Blum-Novotest GmbH is not directly subject to the **Dodd-Frank Act**. The majority of our customers are situated in Germany, Europe and Asia, and are therefore likewise not affected by the Dodd-Frank Act.

We do not obtain conflict minerals themselves nor their derivatives directly from smelting works or other sources from the regions of conflict named in the Dodd-Frank Act. However, because of their properties, metals that are subject to the Dodd-Frank Act form the basis of many electronic components and are contained in our products and in the components we use because of their widespread use.

For this reason, we pay special attention to this matter and consider it to be our duty to create a high degree of transparency to the extent that this is within our capabilities and in cooperation with our suppliers.

In our products, we only use components from reputable manufacturers and distributors with whom we maintain long-term and cooperative partnerships. These suppliers issue statements themselves on the use and origin of the raw materials in their supply chains.

We currently have no information about conflict minerals passing or having passed through our supply chains and into our products. If this should change, Blum-Novotest GmbH will proceed in a self-regulatory manner and take appropriate corrective action. We hope for your understanding that we will not fill out questionnaires or process lists and forms.

We recognise the importance of these topics to our international customers and hope this statement has answered your questions in this regard.

Gullen, Germany, 1 January 2021  
Head of Purchasing and Logistics

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<sup>1</sup> The regulation (EU) 2017/821 of the European Parliament of 17 May 2017, laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas, applies to companies that import conflict minerals (tin, tungsten, tantalum, gold) to the EU and exceed the specific limits.

<sup>2</sup> The Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 "Conflict Minerals" H.R. 4173, is a United States federal law enacted on 21 July 2010. It requires companies with a reporting obligation under United States law regarding trade with securities to disclose dealings in conflict minerals (tantalum, tin, gold, tungsten) from the Democratic Republic of Congo and its neighbouring states. The goal of this law is to prevent the financing of armed groups in the Democratic Republic of Congo through the production and trade of raw materials. The continuation of the regulation in the USA is uncertain, since President Trump already announced plans to repeal the Dodd-Frank Act in February 2017.

<sup>3</sup> Union importers are natural persons or legal entities who register minerals or metals for the release of these materials for free circulation within the meaning of Article 201 of Regulation (EU) No. 952/2013 of the European Parliament and of the Council, or a natural person or legal entity on whose behalf a registration of this type is submitted.