



Conflict Mineral Policy

HAYER & BOECKER
DRAHTWEBEREI UND MASCHINENFABRIK

The mining of certain minerals in the Democratic Republic of Congo (DRC) and the adjoining countries partially contributes to significant human rights abuses and to the financing of violent conflicts in this region. In 2010, U.S. Congress passed legislation that is usually referred to as "Dodd-Frank Act" (full name: "Dodd-Frank Wall Street Reform and Consumer Protection Act"). Section 1502 of the Dodd-Frank Act adopted by the U.S. Securities and Exchange Commission (SEC) require companies who file reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products. "Conflict minerals" contain tantalum, tin, tungsten (and the ores from which they originate) and gold, regardless of where they are sourced, processed or sold.

HAYER & BOECKER OHG does not file reports with the SEC and therefore has no legislative obligations to comply with the conflict minerals requirements covered in Section 1502 of the Dodd-Frank Act. At the same time we recognize the SEC final rule for Section 1502 mandates our direct and indirect customers to undertake due diligence across their global supply chains.

Statement:

We at HAYER & BOECKER OHG endeavor not to purchase any material that contains these "conflict minerals" which directly or indirectly finance or benefit armed groups in the DRC or an adjoining country. We are implementing reasonable due diligence processes to understand where "conflict minerals" are being used in our products and to determine the source and the origin within our supply chain. These actions are based on established frameworks of the Organization for Economic Cooperation and Development (OECD) and from other private sector initiatives. We are contacting our direct suppliers to increase the transparency of the materials they provide to HAYER & BOECKER OHG. We will continue to work closely with customers, suppliers and other stakeholders to secure good practices and feasible solutions.

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