

Conflict Minerals Policy

Purpose

Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, requires US companies listed on the stock exchange to disclose the origin and application of four conflict minerals (tantalum, tungsten, tin and gold “3TG’s”) which are mined in the Democratic Republic of Congo or in any of the nine adjacent countries and could possibly be used to finance violent conflicts.

The European Union published legislation in May 2017 in the form of Regulation 2017/821/EU defining obligations with respect to duty of care in the supply chain of certain minerals and conflict metals imported to the European Union from high-risk regions. In contrast with the Dodd-Frank Act, this regulation includes all conflict and high-risk areas worldwide.

The obligation to disclose the origin of conflict minerals applies to the entire voestalpine supply chain and to all companies involved. voestalpine categorically rejects the use of conflict materials from any of these conflict regions and procures such materials exclusively from responsible sources.

Pursuant to the Dodd-Frank Act and Regulation 2017/821/EU, voestalpine is committed to compliance with the legal requirements pertaining to conflict minerals disclosure. We require compliance with all obligations and an appropriate level of transparency along the supply chain.

Scope

Suppliers of materials containing conflict minerals to voestalpine High Performance Metals LLC, voestalpine High Performance Metals Limited, and voestalpine Additive Manufacturing Centre Limited, collectively, [vHPM](#).

Supplier Requirements

Transparency is important to us along the entire supply chain. In accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, at minimum, all suppliers are required to:

- Supply to vHPM only materials that are “Conflict-Free”
- Inform vHPM of the presence of 3TGs in materials
- Provide transparency in supply chains containing Conflict Minerals (Expectation that suppliers provide the latest version CMRT (RMI) that support due diligence efforts.)
- Adopt policies that are consistent with OECD Due Diligence Guidance Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas