

BBC Cellpack Electrical Products
BBC Cellpack GmbH
PF 201229 · 79752 Waldshut-Tiengen · Germany

Statement regarding conflict minerals in our products

Dodd-Frank Act – Section 1502

The US Dodd-Frank Act became legally binding in July 2010. The Dodd-Frank Act is primarily intended to reform US financial market law. It also includes disclosure and reporting requirements for US-listed companies concerning the use of certain raw materials sourced from the Democratic Republic (DR) of Congo or its neighbouring countries. Section 1502 of the Dodd-Frank Act stipulates that companies subject to reporting requirements under the US Securities Exchange Act must annually disclose to the US Securities and Exchange Commission (SEC) whether "conflict minerals" essential for the production or function of their products are sourced from the DRC or neighbouring countries. The term "conflict minerals" as defined in the Dodd-Frank Act refers to the raw materials tantalum, tin, gold and tungsten if their extraction and trade in these raw materials are used to finance or otherwise support armed groups in the DRC or its neighbouring states. This regulation is designed to prevent the financing of armed groups in the DR Congo through the extraction of and trade in raw materials.

EU Regulation 2017/821

Since 01 January 2021, the EU Regulation 2017/821 has given rise to new requirements for EU importers of tin, tantalum, tungsten and gold. Importing companies must verify as part of the due diligence procedures whether these minerals are sourced from conflict and high-risk areas and publish the results of this verification on an annual basis. This regulation also intends to stem the trade in these four commodities in conflict and high-risk areas in order to eliminate the financing of armed conflict and forced labour.

Statement from BBC Cellpack GmbH

BBC Cellpack GmbH is not subject to any reporting obligations directly to the SEC. We respect and support the protection of human rights, however, and therefore also the objectives of the Dodd-Frank Act and EU Regulation 2017/821. In particular, we ensure that our products do not contain conflict minerals mined in the DRC and neighbouring countries, so that they do not finance the conflict and violence in the Democratic Republic of Congo under any circumstances.

BBC Cellpack GmbH itself does not import or process any conflict minerals. Some of our suppliers' components, however, contain tin. To ensure that our products do not involve conflict minerals, we closely scrutinise our supply chain to determine the origin of conflict minerals. All relevant suppliers are prompted to provide information on the origin of conflict minerals contained in components supplied to us by means of a valid "Conflict Minerals Reporting Template" (CMRT). BBC Cellpack GmbH itself does not perform any audits at smelters or refineries. This is why we rely on the information provided by our suppliers. Consequently, we have clearly communicated our claim and our ambition to remove conflict minerals from our supply chain.

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We expect our suppliers to impose the same demands on their direct suppliers. We endeavour to raise awareness among our suppliers to avoid sourcing products from conflict areas and will take action for suppliers who do not comply with these efforts. The audit of our supply chain underlines the importance we attribute to this issue.

For any further questions, please contact eppurcha01@cellpack.com

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