

Lumineq Oy Conflict Minerals Policy

Introduction

There has been increased awareness of violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern part of the Democratic Republic of the Congo (DRC) and surrounding countries. The definition of “Conflict Minerals” currently refers to gold, tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite.

On August 22, 2012, the final rule regarding sourcing of Conflict Minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”) was approved by the U.S. Securities and Exchange Commission (“SEC”). The rule imposes reporting requirements on publicly traded companies subject to the SEC to report annually the presence of conflict minerals originating from the Conflict Region in the products they manufacture or contract to manufacture whereby the Conflict Minerals are necessary to the functionality or production of a product.

Starting on January 1st, 2021, EU regulation (EU) 2017/821 is 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.

The Responsible Minerals Initiative (RMI) supports the industry toward responsible sourcing by providing tools like Responsible Minerals Assurance Process (RMAP)

and Conflict Minerals Reporting Template (CMRT) to support companies to make informed decisions about responsibly sourced minerals in their supply chains.

Companies around the globe have been requested to practice reasonable due diligence with their supply chain to assure that Conflict Minerals are not being sourced from mines in the Conflict Region in order to prevent financing to non-government military groups, or unlawful military factions.

What is Lumineq doing?

Lumineq supports the aims and objectives of the EU and U.S. legislations and the RMI and our aim is to ensure that only “conflict free” materials and components are used in products that we procure.

Tracing materials back to their mine of origin is however a complex aspect of responsible sourcing. Lumineq has active program to survey its supply chain for the conflict minerals information using RMI’s guidance and reporting formats.

Lumineq’s expectations from its suppliers

Lumineq expects its suppliers to

- I. commit to the EICC Code of Conduct which includes a provision related to the responsible sourcing of minerals.
- II. have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture are conflict free
- III. establish their own due diligence program to ensure conflict-free supply chains.

- IV. ensure that the specified metals are sourced either from mines and smelters outside Conflict Region or from certified conflict-free smelters validated as compliant using RMI RMAP process.
- V. provide written documentation of raw material sources using the latest CMRT reporting template.

Lumineq empowers all employees, suppliers, vendors, contractors and other stakeholders to take ownership in supporting our goal of ensuring that only “conflict free” materials and components are used in products that we procure. Stakeholders are encouraged to inform Lumineq’s management if use of Conflict Minerals is discovered.