



Pushing Performance

HARTING Conflict Minerals Policy

The metals tin, tantalum, tungsten and gold (3T+G) may originate from conflict-affected and high risk areas. Thus, when using these metals it has to be ensured that it is not contributed to conflict or human rights abuses.

HARTING assumes its responsibility and follows the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.¹ This and the Conflict-Free Sourcing Initiative (CFSI) agree that the identification of smelters or refiners is the basis to evaluate risks in the supply chain and that the relevant suppliers should be contacted.

To fulfill our due diligence HARTING will once per year contact the relevant suppliers their products contain the named metals. The information necessary to identify the smelters or refiners will be requested. For the communication the CFSI Conflict Minerals Reporting Template² or its equivalent will be used.

HARTING imposes the following requirements:

- HARTING will not tolerate any serious abuses associated with the extraction, transport or trade of (conflict) minerals.
- HARTING will not tolerate any direct or indirect support to non-state armed groups.
- HARTING will apply all necessary risk mitigation efforts regarding public or private security forces.
- HARTING will apply all necessary risk mitigation efforts regarding bribery and fraudulent misrepresentation of the origin of minerals, money laundering and payment of taxes, fees and royalties to governments.

HARTING integrated a five-step framework as recommended by the OECD Due Diligence Guidance. This is in detail:

- HARTING established an internal management system for conflict minerals.
- HARTING assesses possible risks in reference to the supply chain policy by comparing the names of the identified smelters or refiners with independently verified lists and information from the smelters and refiners or publicly available information.
- HARTING mitigates identified risks by engagement with the upstream partners.
- The due diligence practices of HARTING are audited by independent third parties.
- HARTING reports on its approach and the results.

¹ „OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas“ <http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf>

² <http://www.conflictreesourcing.org/conflict-minerals-reporting-template/>