

**Policy Statement for handling “Conflict Minerals”**

Dodd–Frank Wall Street Reform and Consumer Protection Act („Dodd-Frank Act“),  
Section 1502

Sumitomo Electric Bordnetze Group supports all efforts to prohibit the illegal trade with conflict minerals from the conflict regions in and around the Democratic Republic of Congo.

Minerals are classified as conflicting if they are supported, directly or indirectly, by extraction, transport, trade, handling / processing or export by non-state armed groups. For this we refer to section 1502 of the “Dodd-Frank Act

For these we refer to the paragraph Fifteen (Sec.1502) of the "Dodd-Frank Act". In particular, the "Dodd-Frank Act" refers to tin, tantalum, tungsten, gold and their derivatives, which are funded and promoted from mines owned by armed groups from the aforementioned region.

**Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**

Due to the restrictions on the use of conflict minerals, we expect from our suppliers to avoid any conflict minerals from smelters there are in contradiction.

Information regarding smelters or refiners for minerals such as tin, tantalum, tungsten and gold used by suppliers or sub-suppliers has to be disclosed to SEBN upon request. For this purpose, SEBN suggests that suppliers use the standardized Conflict Minerals Reporting Template, provided by the conflict-free sourcing initiative (cfsi).

Our suppliers shall exercise her due diligence along their supply chain. This includes the implementation of measures, which assure that the minerals used – particularly tantalum, tin, tungsten and gold – do not directly or indirectly finance or benefit armed conflicts.

Due to the restrictions on the use of "Conflict Minerals", we expect our suppliers to disclose and communicate the origin and procurement of the materials mentioned above also in the future.

These due diligence requirements are an extension of our Code of Conduct for Business Partner.

Wolfsburg, June 2019