

Policy Statement on the use of Conflict Minerals

The following statement is based on the content of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act"), Section 1502, and its incorporation into EU law. The "Dodd-Frank Act" specifically refers to tin, tantalum, tungsten, gold (3TG) and their derivatives.

Sumitomo Electric Bordnetze Group welcomes and expressly supports all legal steps to stop the illegal mining and trade of and with the so-called "Conflict Minerals" from conflict and high-risk areas where systematic human rights and international law violations occur. Minerals are classified as conflict minerals if the extraction, transportation, trade, handling/processing or export directly or indirectly supports non-state armed groups. In this regard, we refer to paragraph fifteen (Sec.1502) of the "Dodd-Frank Act".

Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas

Due to restrictions on the use of "Conflict Minerals", we expect our suppliers to avoid any minerals sourced from conflict-affected smelters. Information on smelters or refineries used by the supplier or sub-supplier for minerals such as tin, tantalum, tungsten and gold must be provided upon request by SEBN. SEBN recommends the use of the Conflict-free Sourcing Initiative (CFSI) standardized reporting template for this purpose. Our suppliers are encouraged to fulfill their due diligence obligations along the supply chain. This includes implementing measures to ensure that the minerals used by the supplier - in particular tantalum, tin, tungsten and gold - do not contribute to the direct or indirect promotion or support of armed conflicts. Due to the restrictions on the use of "Conflict Minerals", we will continue to expect our suppliers to disclose the origin and sourcing of the above materials and communicate accordingly. These due diligence requirements apply in addition to our Code of Conduct for Business Partners.

These principles and requirements also apply without restriction to cobalt, copper, graphite, lithium, mica, nickel and the related Extended Minerals Reporting.

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