

Disclosure Statement on Compliance with the EU Conflict Minerals Regulation (Regulation (EU) 2017/821) – Reporting Year 2023

1. Company Profile and Responsible Sourcing Policy

We, Sindlhauser Materials GmbH, are a manufacturer and supplier of coating materials for vacuum coating technology, and are committed to the responsible sourcing of minerals.

Our policy is to avoid conflict minerals from high-risk areas and to ensure that our products are manufactured in accordance with the highest ethical standards.

2. Implementation of due diligence under OECD guidelines

We have implemented a comprehensive due diligence process in accordance with the OECD Guidelines and the EU Conflict Minerals Regulation:

- Corporate Management System: An interdisciplinary team consisting of management, procurement and materials experts is responsible for monitoring and implementing our procurement policies.
- Risk analysis: We conduct annual risk analyses to verify the origin of the minerals we source and identify potential conflict and high-risk areas.
- Risk mitigation: When risks are identified, we work closely with our suppliers to ensure that minerals come from conflict-free sources. Suppliers who do not meet our standards are consistently removed from the supply chain.
- On-site audits: We regularly conduct audits of our suppliers to ensure compliance with our procurement guidelines. This will be introduced in 2024.
- Disclosure: This statement represents our annual report, which complies with the requirements of the EU Conflict Minerals Regulation.

3. Results of the risk assessment and measures taken

Our risk analysis in 2023 did not reveal any potential risks that the minerals we source could come from potential high-risk areas.

Still, we have decided on the following preventive measures:

- Conducting on-site supplier audits.
- Stop working with suppliers who don't meet the requirements.
- Working with partner organizations to promote a transparent and conflict-free supply chain.

4. Preventive measures

Our preventive measures include regular training of our suppliers and conducting due diligence before concluding supply contracts. All our suppliers are required to sign our Code of Conduct and meet the requirements of the EU Conflict Minerals Regulation, as well as to report as part of CMRT reporting.

5. Complaint procedure

We have set up a complaints procedure that is open to all affected individuals and organizations. Complaints can be made to our compliance team via our website or directly by email.

<mailto:compliance@sindlhauser.de>

6. Review of effectiveness and further development

The effectiveness of our measures is reviewed annually. For the coming year, we plan to work more closely with our suppliers, implement an audit plan and request data in accordance with the CMRT Reporting Template.

Kempton, 30. Juni 2024
Sindlhauser Materials GmbH

Martina Wagner
Geschftsleitung