

Information

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US Conflict Minerals Policy

The Zumtobel Group defines conflict minerals as minerals that are mined under conditions in which armed conflicts and human rights violations take place. The term conflict minerals is primarily associated with the four minerals

- Tungsten
- Tantalum
- Tin
- Gold

that are mined in the Democratic Republic of the Congo or a neighbouring country. These minerals are used in the production of various goods such as in electronic devices.

Responsible mineral sourcing is an important part of the Zumtobel Group's commitment to assessing the sustainability performance of our suppliers. We have also written down and stated this in the guideline on sustainable procurement. In the efforts written down, we focus on measures in our supply chain to ensure that our products do not finance conflicts Democratic Republic of the Congo or a neighbouring country.

The Zumtobel Group is committed to fulfilling its due diligence obligations, implementing proactive processes, systems and procedures to ensure that potential risks in our supply chain are identified and avoided. In doing so, we verify and ensure that minerals are sourced responsibly and do not contribute to conflict or other illegal activities.

EU Conflict Minerals Policy

At the Zumtobel Group, we are committed to responsible sourcing practices and ethical business conduct. While we may incorporate tin, tantalum, tungsten, and gold (3TG minerals) in our electronic products, we declare that we are not directly subject to the European Union (EU) Conflict Minerals Regulation (EU Regulation 2017/821). As a manufacturer, we do not directly import these minerals into the EU market.

We understand the importance of preventing the financing of armed groups in conflict-affected areas and acknowledge our responsibility to promote transparency and ethical practices throughout our supply chain. Although not directly regulated by the EU Conflict Minerals Regulation, we strive to ensure that our suppliers comply with responsible sourcing guidelines, such as those outlined by the Organisation for Economic Co-operation and Development (OECD).

Our commitment to responsible sourcing extends beyond regulatory requirements as we work diligently to maintain a responsible supply chain that prioritizes the ethical sourcing of minerals and the well-being of the communities affected by their extraction.

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For further information regarding the EU Conflict Minerals Regulation, please visit the European Commission's webpage that explains the regulation in detail:

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https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation/regulation-explained_en

Further details on the Zumtobel Group's commitment to sustainability can be found in the Sustainability section of our website: <https://z.lighting/en/group/sustainability/>



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