

Our policy on the use of conflict minerals in our coatings

USA / Dodd-Frank Act:

In 2010, the “Dodd-Frank Wall Street Reform and Consumer Financial Protection Act” was signed into law. Pursuant to this law, US stock-listed companies must disclose information about whether the products they manufacture or contract to manufacture contain “Conflict Minerals” that originated in the Democratic Republic of Congo (“DRC”) or its neighbouring countries. "Conflict Minerals" (so-called 3TGs), as defined by the Act, include gold, columbite-tantalite (coltan), cassiterite, and wolframite, as well as their derivatives, tantalum, tin and tungsten. The Dodd-Frank Act seeks to prevent armed groups from financing conflicts in the DRC or neighbouring countries through the sale of certain minerals extracted from that region.¹

EU / Regulation of Conflict Minerals:

In 2017, a corresponding Regulation applicable to direct importers has been initiated by the EU. Above-mentioned regulation prescribes due diligence for the import of “Conflict Minerals” within the EU. The initial conception (hitherto Central Africa) has now spread over conflict and high-risk areas worldwide.

The Wohlrab Company Group itself is not subject to mandatory disclosure nor reporting obligation. However, by acting as an international provider of technical & decorative coatings, we are part of the supply chain. As we take this issue very seriously here at Wohlrab, we would like to inform our business partners about our policy.

We are not a direct importer of the above-mentioned minerals but have a close collaboration with a few very reputable distributors for the procurement of our coating materials and compounds, necessary to the functionality or production of our products. Great emphasis is put on trust and a long-standing work relationship with our suppliers, who broach the issue of transparency and traceability.

Suppliers of minerals and compounds, which are categorized as such and freely selectable by us as a job coating service-provider are obligated to confirm their free of conflict origin. We demand confirmation in periodical intervals. For instance by asking to receive data on the smeltery and a subsequent comparison with the "Conformant Smelters and Refiners" list released by the "Responsible Minerals Initiative".

Unfortunately, we are unable to provide a guarantee of origin concerning materials utilized by our company. Though within the scope of our possibilities, we confirm that we treat this topic with due sensitivity. In line with our company policy there will be no deliberate use of “Conflict Minerals”.

Langenzenn, 28th.January.2019

Christian Wohlrab

Owner of Wohlrab companies

Pablo Wurzwallner

Head of Purchasing

¹ Merkblatt: Dodd-Frank Act und „Konfliktmineralien“ Umgang mit Offenlegungspflichten entlang der Lieferkette (Arbeitsgruppe von BDI, BGA, DIHK, Spectaris, VDM, WVM und ZVEI, 5.11.2013)