

CONFLICT MINERALS COMPLIANCE STATEMENT

1. Regulatory Context

In accordance with:

- **EU Regulation (EU) 2017/821** of the European Parliament and of the Council of 17 May 2017 establishing supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, and gold (3TG) originating from conflict-affected or high-risk areas; and
- the **U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502**, concerning the use of conflict minerals,

COMITRONIC-BTI is fully committed to maintaining a responsible supply chain and to avoiding the use of minerals that directly or indirectly finance armed conflict, human rights abuses, or corruption.

2. Compliance Declaration

Following supplier assessment and document verification:

- To the best of our knowledge, **no tin (Sn), tantalum (Ta), tungsten (W), or gold (Au)** contained in COMITRONIC-BTI products originates from conflict-affected or high-risk areas identified by the **OECD** or the **European Commission**.
- All our suppliers are required to provide a **CMRT (Conflict Minerals Reporting Template)** in the standard format defined by the **Responsible Minerals Initiative (RMI)**.
- COMITRONIC-BTI maintains appropriate due-diligence documentation and updates this declaration **annually** or whenever significant supply chain changes occur.

3. Ethical Commitment and Traceability

COMITRONIC-BTI ensures:

- Sourcing only from suppliers declaring compliance with RMI/CMRT requirements;
- Exclusion of suppliers unable to guarantee full traceability of 3TG materials;
- Annual internal audits covering material compliance and documentation (RoHS 2, REACH, POP, SCIP, Conflict Minerals, etc.).

4. Conclusion

Based on the information available at this time, **COMITRONIC-BTI certifies that all its products are in compliance with the Conflict Minerals Regulation and do not contain minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries** as defined by applicable laws.

Issued in Canéjan
For COMITRONIC-BTI
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