



## GMN Paul Müller Industrie GmbH & Co. KG

### **GMN statement about the Conflict Minerals Regulation (EU) 2017/821, amended by (EU) 2020/1588**

On 1 January 2021, the EU regulation related to conflict minerals came into force. The regulation specifies strict due diligence and verification obligations along the supply chain for EU importers of tin, tantalum, tungsten and gold (3TG) as well as their ores.

Conflict-affected and high-risk areas: in these regions there are armed conflicts or a fragile situation after a conflict, they have weak or inexistent governance and security. There are systematic violations of international law, including human rights abuses.

This regulation is intended to prevent the financing of violence and human rights abuses in conflict-affected areas. For this reason, the importers of 3TG must introduce risk management for raw material procurement, this risk management is checked by an external audit.

In this way the EU is responding to the US-American Dodd-Frank Act (DFA) which came into force on 22 August 2012. German companies may be affected indirectly by the provisions of the DFA if proof of origin requirements are forwarded to them within the supply chain.

The European regulation is not exactly the same as the DFA. The provisions of the EU Conflict Minerals Regulation directly affect companies that import 3TG into the EU and exceed a specific volume threshold. Also semi-finished products such as wire or bars may also fall under the regulation.

For the downstream processing industry, that is manufacturers and importers of end-products, there are no binding provisions. For GMN Paul Müller Industrie GmbH & Co. KG (including all associated companies) there is no statutory obligation related to the declaration of conflict materials as per the EU regulation.

If you have any questions related to this issue, please contact the Head of Central Procurement ([r.wolff@gmn.de](mailto:r.wolff@gmn.de)).

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GMN Paul Müller Industrie GmbH & Co. KG

signed

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Senior management

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