

May 2023

Customer Information Conflict Minerals ((EU)2017/821 or DFA Dodd-Frank-Act)

On 1 January 2021, the EU Regulation on Conflict Minerals came into force, according to which EU importers of conflict minerals - namely tin, tantalum, tungsten, their ores and gold (3TG) as well as the extended conflict minerals cobalt and MICA - will be subject to extensive due diligence and inspection obligations along the supply chain.

The position of Brütsch/Rüegger Metals in this matter and the handling of the regulation can be stated as follows:

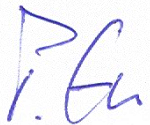
- a) Brütsch/Rüegger Metals trades in semi-finished steel and metal products and does not itself directly import the minerals concerned. We are therefore not directly affected by the Ordinance, but as a company in the so-called downstream industry we are required to comply with a voluntary due diligence obligation. We consistently fulfil this duty in accordance with c).
- b) With a few exceptions, our products consist of metals or alloys that are not covered by the ordinance. The majority of our products are therefore not affected. The proof of this is recorded in the acceptance test certificate 3.1 with the declaration of the effective chemical analysis. This proof can be documented by ordering the acceptance test certificate for each delivered article. In the case of manufacturing processes based on scrap as a raw material, the origin status for all alloy components is "undeterminable" and accordingly the products concerned are generally entitled to be considered "conflict free".
- c) The few products in our range that are affected by the regulation are alloys with tin or tungsten as a component. These products are sourced from reputable manufacturers in the EU who have committed themselves to comply with the regulation. Appropriate information is obtained from these suppliers and, to our current knowledge, none of our suppliers use materials originating from the countries defined in the regulation.

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We hope that this information letter has demonstrated our responsible approach to the Regulation ((EU)2017/821) and thank you for your attention and trust in Brütsch/Rüegger Metals.

Yours sincerely

Brütsch/Rüegger Metals Ltd



Patrick Epp
Managing Director



Diego Kuhn
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