

To whom it may concern,

Paris, Friday, 4 January 2023

RE: 2023-04-01-COUR 02/PR

Subject: **Conflict Minerals Policy Statement**

ERASTEEL is delivering High-speed steel products, made by conventional or powder metallurgy.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act requires due diligence and disclosure requirements on companies that manufacture products containing certain minerals designated as "Conflict Minerals" – cassiterite, columbite, tantalite, gold, wolframite, and their derivatives tin, tantalum and tungsten – sourced from certain Central Africa countries – Democratic Republic of Congo or surrounding countries.

These requirements are based on concerns that revenues obtained from the commercialization of these minerals may finance the ongoing conflict in the Democratic Republic of Congo.

Although this is a US law, it impacts our companies that belong to the ERAMET Group, regardless of where our suppliers might be located.

In accordance with the ERAMET Group Code of Ethics, Aubert & Duval and Erasteel undertake to prohibit the use of « conflict minerals » for all our products, and to get organized with suppliers to meet this requirement.

To ensure compliance with these requirements, our company requires that each supplier in its supply chain provide information regarding the conflict minerals that may be contained in the products purchased by our companies and so continue to source responsibly.

Moreover, having received the commitments from our cobalt and tungsten primary suppliers, we certify that the Tungsten (W) and the Cobalt (Co) used to manufacture our products do not come from the conflict area of the Democratic Republic of Congo or adjoining countries and that we don't use Tin (Sn), Tantalum (Ta) nor Gold (Au).


ERASTEEL SAS, Groupe Eramet

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RCS Paris B 352 849 137 - 00018 APE 4672Z



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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.22
May 11, 2022

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Erasteel Kloster AB	
Declaration Scope or Class (*):	A. Company	
Description of Scope:		
Company Unique ID:	556057-1811	
Company Unique ID Authority:	Bolagsverket-Tierp kommun, Uppsala län- Sweden	
Address:	SE-815 82 Söderfors, Tierp, Sweden	
Contact Name (*):	ROCABOIS Philippe	
Email - Contact (*):	philippe.rocabois@eramet.com	
Phone - Contact (*):	+33788302734	
Authorizer (*):	ROCABOIS Philippe	
Title - Authorizer:	Technical and metallurgical director	
Email - Authorizer (*):	philippe.rocabois@eramet.com	
Phone - Authorizer:		
Effective Date (*):	4-Jan-2023	

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)

	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	Yes	alloy element of various high speed steel grades

2) Does any 3TG remain in the product(s)? (*)

	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	Yes	alloy element of various high speed steel grades

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)

	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	no	Supplied essentially as FeW by European Traders (Metherma, Nordmet, Scandinavian Steel AB and Speciality Metal Ressources)

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)

	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	no	Supplied essentially as FeW by European Traders (Metherma, Nordmet, Scandinavian Steel AB and Speciality Metal Ressources)

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)

	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	no	Our Suppliers recycle carbide muds and grinding scraps

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	100%	

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	All suppliers have been identified and they guarantee the origin of their FeW supply

8) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	


Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	see attached file, A Conflict Mineral Policy Statement signed by our A&D VP Quality on the 22-July-2021 and he Yes forbides supply from 3TG area.
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	Yes	https://www.erasteel.com/wp-content/uploads/2019/09/2019-02-08_Package_Conflict_Minerals_5.11proof_ES_EN.pdf
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	No	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	Due diligence on our Supply Chain
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Included in standard contract conditions
G. Does your review process include corrective action management? (*)	No	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	

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To ensure all required fields have been completed before submitting to your customer review form for any line items highlighted in red Required fields remaining to be completed

Required fields	Answer provided	Notes	Hyperlink to source
Company Name (*)	Erasteel Iberia AB	Complete	
Declaration Scope or Class (*)	A. Company	Complete	
Contact Name (*)	RODRIGES Philippe	Complete	
Email - Contact (*)	ph.ripges@eramet.com	Complete	
Phone - Contact (*)	+33 800 00734	Complete	
Authoriser (*)	RODRIGES Philippe	Complete	
Email - Authoriser (*)	ph.ripges@eramet.com	Complete	
Effective Date (*)	20-Aug-2022	Complete	
1. Do any 2020 transactions (i.e. for or on behalf of the company) (i.e. do the 2020 transactions)?			
Conclusion		Complete	
Yes		Complete	
No		Complete	
2. Do any 2020 remain in the product(s)?			
Conclusion		Complete	
Yes		Complete	
No		Complete	
3. Do any of the suppliers in your supply chain have the 2020 from the conflict minerals (CM) (i.e. see definitions table)?			
Conclusion		Complete	
Yes		Complete	
No		Complete	
4. Do any 2020 remain in the product(s) (i.e. do the 2020 transactions)?			
Conclusion		Complete	
Yes		Complete	
No		Complete	
5. Have any potential conflict minerals been included in your supply chain (see note)?			
Conclusion		Complete	
Yes		Complete	
No		Complete	
6. Have you identified all of the suppliers applying the 2020 to your supply chain? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
7. Have you implemented due diligence measures for responsible mining? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
8. Have all applicable supplier information received by your company been reported in this declaration? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
9. Have you established a responsible minerals sourcing policy? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
10. Do you have a responsible minerals sourcing policy which applies to your product? (Yes - if yes, the user shall specify the URL in the comment field.)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
11. The URL in the comment field	https://www.eramet.com/contenu/legende/2019/09/2019-02-08-Declarac_Conflict_Minerais	Complete	
12. Do you require your direct suppliers to source the 2020 from suppliers whose due diligence practices have been validated by an independent third party audit organization? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
13. Have you implemented due diligence measures for responsible mining? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
14. Does your company conduct Conflict Minerals Assessments (CMA) of all your mineral suppliers? (*)			
Conclusion		Complete	
Yes in conformance with ICGI 2020 (e.g. OMT)		Complete	
15. Do you review due diligence information received from your suppliers against your company's standards? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
16. Does your review process include corrective action management? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
17. Is your company required to file an annual conflict minerals disclosure? (*)			
Conclusion		Complete	
Yes		Complete	
No		Complete	
Product List	No products or item numbers listed	Complete	
Supplier List - Turbulent		Complete	
Supplier List - No		Complete	
Supplier List - CM		Complete	
Supplier List - Turbulent		Complete	



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Extended Mineral Reporting Template (EMRT)

English

Revision 1.11
November 4, 2022
[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on cobalt or natural mica.

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Erasteel SAS and Erasteel Kloster AB
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	352 849 13700042
Company Unique ID Authority:	CPE- RCS Paris - France
Address:	10 Boulevard de Grenelle - 75015 PARIS - FRANCE
Contact Name (*):	ROCABOIS Philippe
Email - Contact (*):	philippe.rocabois@eramet.com
Phone - Contact (*):	+33788302734
Authorizer (*):	ROCABOIS Philippe
Title - Authorizer:	Technical and metallurgical director
Email - Authorizer (*):	philippe.rocabois@eramet.com
Phone - Authorizer:	
Effective Date (*):	4-Jan-2023

Answer the following questions 1 - 7 based on the declaration scope indicated above

- 1) Is any of the cobalt or natural mica intentionally added or used in the product(s) or in the production process? (*)

	Answer	Comments
Cobalt (*)	yes	
Mica	no	
- 2) Does any cobalt or natural mica remain in the product(s)? (*)

	Answer	Comments
Cobalt (*)	yes	
Mica		
- 3) Do any of the smelters or processors in your supply chain source the cobalt or natural mica from conflict-affected and high-risk areas? (OECD Due Diligence Guidance, see definitions tab) (*)

	Answer	Comments
Cobalt (*)	no	
Mica		
- 4) Does 100 percent of the cobalt originate from recycled or scrap sources? (*)

	Answer	Comments
Cobalt (*)	no	
- 5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)

	Answer	Comments
Cobalt (*)	100%	
Mica		
- 6) Have you identified all of the smelters or processors supplying the cobalt or natural mica to your supply chain? (*)

	Answer	Comments
Cobalt (*)	Yes	
Mica		
- 7) Has all applicable smelter or processor information received by your company been reported in this declaration? (*)

	Answer	Comments
Cobalt (*)	No	
Mica		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	https://www.erasteel.com/wp-content/uploads/2019/09/2019-02-08_Package_Conflict_Minerals-5.11proof_ES_EN.pdf
C. Do you require your direct suppliers to source cobalt from smelters or natural mica from processors whose due diligence practices have been validated by an independent third-party audit program? (*)	No	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	
E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPCI 755 (e.g. EMRT)	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
G. Does your review process include corrective action management? (*)	No	

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To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red
[Click here to return to Declaration tab](#) [Click here to return to Smelter List](#)

Required fields remaining to be completed
1

Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*):	Erasteel SAS and Erasteel Kloster AB	Complete	
Declaration Scope or Class (*):	A. Company	Complete	
Location of Origin		Complete	
Contact Name (*):	ROCABOIS Philippe	Complete	
Email - Contact (*):	philippe.rocabois@eramet.com	Complete	
Phone - Contact (*):	+33788302734	Complete	
Authorizer (*):	ROCABOIS Philippe	Complete	
Email - Authorizer (*):	philippe.rocabois@eramet.com	Complete	
Effective Date (*):	4-Jan-2023	Complete	
1) Is any of the cobalt or natural mica intentionally added or used in the product(s) or in the production process? (*)			
Cobalt(*)	yes	Complete	
Mica	no	Complete	
2) Does any cobalt or natural mica remain in the product(s)? (*)			
Cobalt(*)	yes	Complete	
Mica		Complete	
3) Do any of the smelters or processors in your supply chain source the cobalt or natural mica from conflict-affected and high-risk areas? (OECD Due Diligence Guidance, see definitions tab) (*)			
Cobalt(*)	no	Complete	
Mica		Complete	
4) Does 100 percent of the cobalt originate from recycled or scrap sources? (*)			
Cobalt(*)	no	Complete	
5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)			
Cobalt(*)	1	Complete	
Mica		Complete	
6) Have you identified all of the smelters or processors supplying the cobalt or natural mica to your supply chain? (*)			
Cobalt(*)	Yes	Complete	
Mica		Complete	
7) Has all applicable smelter or processor information received by your company been reported in this declaration? (*)			
Cobalt(*)	No	Complete	
Mica		Complete	
Question			
A. Have you established a responsible minerals sourcing policy? (*)	Yes	Complete	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field. *)	Yes	Complete	
The URL in the comment field	https://www.erasteel.com/wp-content/uploads/2019/09/2019-02-08_Package_Conflict_Minerals_5.11proof_ES_EN.pdf	Complete	
C. Do you require your direct suppliers to source cobalt from smelters or natural mica from processors whose due diligence practices have been validated by an independent third-party audit program? (*)			
Cobalt(*)	No	Complete	
Mica		Complete	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	Complete	
E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant suppliers? (*)	Yes, in conformance with IPC1755 (e.g. EMRT)	Complete	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Complete	
G. Does your review process include corrective action management? (*)	No	Complete	
Product List	products in the product list tab	Complete	
Smelter List - Cobalt		Complete	
Smelter List - Mica		Complete	
All rows with "Smelter not listed" selected, have a name and country listed		N/A	



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Option A: If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I and J will auto-populate); D will grey out.

Option B: If you have a Metal and Smelter Look-up name combination, complete the following steps:
 Step 1. Select Metal in column B
 Step 2. Select from dropdown in column C (wrong combination will trigger RED color)

Option C: If you have a Metal and Smelter Name combination, complete the following steps:
 Step 1. Select Metal in column B
 Step 2. Select "Smelter Not Listed" in the Smelter Look-up drop down and complete columns D & E
 Step 3. Enter all available smelter information in columns H through Q

(*) Mandatory fields are noted with an asterisk.
 (1) Entry required when Smelter Look-up = "Smelter not listed"

NOTE: A combination of Options A, B and C may be used to complete the Smelter List. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RMI by contacting RMI@responsiblebusiness.org.

Smelter Identification Number	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
Input Column									
	Tungsten	Fujian Ganmin RareMetal Co., Ltd.		CHINA	CID003401	RMI		Longyan	Fujian Sheng
	Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.		CHINA	CID002315	RMI		Ganzhou	Jiangxi Sheng
	Tungsten	Asia Tungsten Products Vietnam Ltd.		VIET NAM	CID002502	RMI		Vinh Bao District	Hai Phong

TO BEGIN:


Option A: If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I and J will auto-populate); D will grey out.

Option B: If you have a cobalt or natural mica and Smelter Look-up name combination, complete the following steps:
 Step 1. Select Metal in column B
 Step 2. Select from dropdown in column C

Option C: If you have a cobalt or natural mica and Smelter Name combination, complete the following steps:
 Step 1. Select Metal in column B
 Step 2. Select "Smelter Not Listed" in the Smelter Look-up drop down and complete columns D & E
 Step 3. Enter all available smelter information in columns H through Q

(*) Mandatory fields are noted with an asterisk.
 (1) Entry required when Smelter Look-up = "Smelter Not Listed"

NOTE: A combination of Options A, B and C may be used to complete the Smelter List. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RMI by contacting RMI@ResponsibleBusiness.org.



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[Link to RMAP Conformant Smelter List](#)

Version 1.11
 November 4, 2022

Smelter Identification Number	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province	Smelter Contact Name	Smelter Contact Email	Proposed next steps	Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap sources?	Comments
Input Column																
	Cobalt	Freeport Kokkola		FINLAND	CID003226	RMI		Kokkola	Helsinki							
	Cobalt	Glencore Nickelwerk Refinery		NORWAY	CID003403	RMI		Kristiansand	Aust-Agder							
	CID003278	Cobalt	Sumitomo Metal Mining		JAPAN	CID003278	RMI	Nishama	Ehime							
	CID003239	Cobalt	Port Colborne Refinery		CANADA	CID003239	RMI	Port Colborne	Ontario							
	CID003232	Cobalt	Dynaltec Madagascar Company		MADAGASCAR	CID003232	RMI	Toamasina	Toamasina							
	CID003406	Cobalt	Murrin Murrin Nickel Cobalt Plant		AUSTRALIA	CID003406	RMI	Laverton	Western Australia							
	CID003279	Cobalt	Mine de Bou-Azzer		MOROCCO	CID003279	RMI	Tazenakht	Drâa-Tafilalet							
	CID003390	Cobalt	NORILSK NICKEL HARJAVALTA OY		FINLAND	CID003390	RMI	Harjavalta	Satakunta							