



To whom it may concern,

Paris, June 15th 2023

RE: 2023-06-15-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 or adjoining countries.

Although this is a US law, it impacts our companies, regardless of where our suppliers might be located.

In accordance with the ERASTEEL Code of Ethics, ERASTEEL undertakes 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


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Tel. : +33 (0)1 45 38 63 00

RCS Paris B 352 640 137 - 00018 APE 4672Z

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Conflict Minerals Reporting Template (CMRT)																								
 <p style="text-align: center;"> Select Language Preference Here: 通過選擇你的語言: 사용할 언어를 선택하십시오: 最も適当なところから選択してください: Sélectionner la langue préférée ici: Seleccione Preferència de idioma aquí: Wählen sie hier die Sprache: Selezionare el lenguaje de preferencia aquí: Selezionare la lingua di preferenza qui: Burada Dil Tercihini Belirleyin: </p>	<div style="border: 1px solid black; height: 40px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; padding: 5px; text-align: center;">English</div> <div style="text-align: right; font-size: small; margin-top: 20px;"> Revision 6.31 May 26, 2023 Link to Terms & Conditions </div>																							
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:	Production and commercialisation of conventional and powder metallurgy high speed steel																							
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 (*):	14-Jun-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? (*)																								
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3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)																								
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5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)																								
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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 7-January-2022 and it 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/2023/02/20230104_ES-2023_01_CMRTMRT_Compliance-Letter_KL_EN-1.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 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	
Description of Scope:		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 receive 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	0 products on item numbers listed	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 Input Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification Number	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
	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 Input Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification Number	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
	Cobalt	Freeport Kokkola		FINLAND	CID003226	RMI		Kokkola	Mellersta Skarvö							
CID003403	Cobalt	Glenore Nickelverik Refinery		NORWAY	CID003403	RMI		Kristiansand	Aust-Agder						No	
CID003278	Cobalt	Sumitomo Metal Mining		JAPAN	CID003278	RMI		Niigata	Ehime						No	
CID003239	Cobalt	Port Colborne Refinery		CANADA	CID003239	RMI		Port Colborne	Ontario						No	
CID003232	Cobalt	Dynatrac Madagascar Company		MADAGASCAR	CID003232	RMI		Toamasina	Toamasina						No	
CID003406	Cobalt	Murrin Murrin Nickel Cobalt Plant		AUSTRALIA	CID003406	RMI		Laverton	Western Australia						No	
CID003279	Cobalt	Mine de Bou-Azzer		MOROCCO	CID003279	RMI		Taznakht	Drâa-Tafilalet						No	
CID003390	Cobalt	NORILSK NICKEL HÄRJÄVALTA OY		FINLAND	CID003390	RMI		Härjavalta	Satakunta						No	