



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 ERASTEEL, 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).

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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.31
May 26, 2023

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

[Link to Terms & Conditions](#)

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
Declaration Scope or Class (*):	A. Company
Description of Scope:	Production and commercialisation of conventional and powder metallurgy high speed steel
Company Unique ID:	352 849 13700042
Company Unique ID Authority:	CFE- 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 (*):	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? (*)

	Answer	Comments
Tantalum	no	
Tin	no	
Gold	no	
Tungsten (*)	yes	

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

	Answer	Comments
Tantalum		
Tin		
Gold		
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		
Tin		
Gold		
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		
Tin		
Gold		
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		
Tin		
Gold		
Tungsten (*)	no	Our Suppliers recycle carbide muds and grinding scraps, 82% of tungstene is from recycled scrap and material

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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	

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/fr/documents/
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? (*)	Yes	
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 Required fields remaining to be completed

[Click here to return to Declaration tab](#)

Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*)	Erasteel SAS	Complete	
Declaration Scope or Class (*)	A. Company	Complete	
		Production and commercialization of conventional and powder metallurgy high speed steel	
Contact Name (*)	EDCARLOS Philippe	Complete	
Email - Contact (*)	philippe.machob@erasteel.com	Complete	
Phone - Contact (*)	+33788302754	Complete	
Authoriser (*)	EDCARLOS Philippe	Complete	
Email - Authoriser (*)	philippe.machob@erasteel.com	Complete	
Effective Date (*)	14-Jun-2023	Complete	
Do you have any subcontractors? (*)	no	Complete	
Supplier		Complete	
TC	no	Complete	
SD	no	Complete	
Compliant (*)	yes	Complete	
Does any STC remain in the product? (*)			
Supplier		Complete	
TC		Complete	
SD		Complete	
Compliant (*)	yes	Complete	
Do you use all the materials in your supply chain that are STC from the declared countries? (SD, SDG, SDG2, SDG3, SDG4, SDG5, SDG6, SDG7, SDG8, SDG9, SDG10, SDG11, SDG12, SDG13, SDG14, SDG15, SDG16, SDG17, SDG18, SDG19, SDG20, SDG21, SDG22, SDG23, SDG24, SDG25, SDG26, SDG27, SDG28, SDG29, SDG30, SDG31, SDG32, SDG33, SDG34, SDG35, SDG36, SDG37, SDG38, SDG39, SDG40, SDG41, SDG42, SDG43, SDG44, SDG45, SDG46, SDG47, SDG48, SDG49, SDG50, SDG51, SDG52, SDG53, SDG54, SDG55, SDG56, SDG57, SDG58, SDG59, SDG60, SDG61, SDG62, SDG63, SDG64, SDG65, SDG66, SDG67, SDG68, SDG69, SDG70, SDG71, SDG72, SDG73, SDG74, SDG75, SDG76, SDG77, SDG78, SDG79, SDG80, SDG81, SDG82, SDG83, SDG84, SDG85, SDG86, SDG87, SDG88, SDG89, SDG90, SDG91, SDG92, SDG93, SDG94, SDG95, SDG96, SDG97, SDG98, SDG99, SDG100)			
Supplier		Complete	
TC		Complete	
SD		Complete	
Compliant (*)	no	Complete	
Do you use all the materials in your supply chain that are STC from the declared countries and high risk areas?			
Supplier		Complete	
TC		Complete	
SD		Complete	
Compliant (*)	no	Complete	
Do you have any subcontractors at the level of your products? (SD, SDG, SDG2, SDG3, SDG4, SDG5, SDG6, SDG7, SDG8, SDG9, SDG10, SDG11, SDG12, SDG13, SDG14, SDG15, SDG16, SDG17, SDG18, SDG19, SDG20, SDG21, SDG22, SDG23, SDG24, SDG25, SDG26, SDG27, SDG28, SDG29, SDG30, SDG31, SDG32, SDG33, SDG34, SDG35, SDG36, SDG37, SDG38, SDG39, SDG40, SDG41, SDG42, SDG43, SDG44, SDG45, SDG46, SDG47, SDG48, SDG49, SDG50, SDG51, SDG52, SDG53, SDG54, SDG55, SDG56, SDG57, SDG58, SDG59, SDG60, SDG61, SDG62, SDG63, SDG64, SDG65, SDG66, SDG67, SDG68, SDG69, SDG70, SDG71, SDG72, SDG73, SDG74, SDG75, SDG76, SDG77, SDG78, SDG79, SDG80, SDG81, SDG82, SDG83, SDG84, SDG85, SDG86, SDG87, SDG88, SDG89, SDG90, SDG91, SDG92, SDG93, SDG94, SDG95, SDG96, SDG97, SDG98, SDG99, SDG100)			
Supplier		Complete	
TC		Complete	
SD		Complete	
Compliant (*)	100%	Complete	
Have you identified all of the suppliers supplying the STC in your supply chain? (*)			
Supplier		Complete	
TC		Complete	
SD		Complete	
Compliant (*)	yes	Complete	
Do all applicable supplier information received by your company been reported in this declaration? (*)			
Supplier		Complete	
TC		Complete	
SD		Complete	
Compliant (*)	yes	Complete	
Have you established a responsible minerals sourcing policy? (*)	Yes	Complete	
Do you have 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/fr/documents/	Complete	
Do you require your direct suppliers to adhere the STC from countries where their diligence practices have been validated by an independent third party audit organization? (*)	Yes	Complete	
Do you implement due diligence measures for responsible mining? (*)	Yes	Complete	
Does your company conduct Conflict Minerals surveys of your relevant suppliers? (*)	Yes, in conformance with IPCI 725 (i.e., CMRT)	Complete	
Do you receive due diligence information received from your suppliers against your company's commitments? (*)	Yes	Complete	
Does your review process include corrective action management? (*)	No	Complete	
Do you have a process to file an annual conflict minerals disclosure? (*)	No	Complete	
Conflict List	No products or item numbers listed	Complete	
Conflict List - Titanium		Complete	
Conflict List - Fe		Complete	
Conflict List - Cu		Complete	
Conflict List - Tungsten		Complete	
Do you have any subcontractors?		Complete	

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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.31
May 26, 2023

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

[Link to Terms & Conditions](#)

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? (*)

	Answer	Comments
Tantalum	no	
Tin	no	
Gold	no	
Tungsten (*)	yes	

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

	Answer	Comments
Tantalum		
Tin		
Gold		
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		
Tin		
Gold		
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		
Tin		
Gold		
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		
Tin		
Gold		
Tungsten (*)	no	Our Suppliers recycle carbide muds and grinding scraps, 82% of tungstene is from recycled scrap and material

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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_Compilance-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 Required fields remaining to be completed

[Click here to return to Declaration tab](#)

Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*)	Erasteel Klobar AS	Complete	
Declaration Scope or Class (*)	A. Company	Complete	
Contact Name (*)	ROCAROS Philippe	Complete	
Email - Contact (*)	philippe.machob@erasteel.com	Complete	
Phone - Contact (*)	+3788302754	Complete	
Authoriser (*)	ROCAROS Philippe	Complete	
Email - Authoriser (*)	philippe.machob@erasteel.com	Complete	
Effective Date (*)	4-Jan-2023	Complete	
Do you have any subcontractors or suppliers? (*)			
Supplier		Complete	
Yes	No	Complete	
No	No	Complete	
Yes	No	Complete	
Supplier (*)	Yes	Complete	
Does any STC remain in the product? (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	Yes	Complete	
Do any of the suppliers in your supply chain have an STC from the covered countries? (STC items, see footnote 4.1) (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	No	Complete	
Do you have any subcontractors or suppliers? (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	Yes	Complete	
Do you have any subcontractors or suppliers? (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	No	Complete	
Do you have any subcontractors or suppliers? (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	No	Complete	
Do you have any subcontractors or suppliers? (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	100%	Complete	
Have you identified all of the suppliers supplying to you in your supply chain? (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	Yes	Complete	
Do all applicable supplier information received by your company meet the requirements of the declaration? (*)			
Supplier		Complete	
Yes		Complete	
No		Complete	
Supplier (*)	Yes	Complete	
Have you established a responsible sourcing strategy? (*)	Yes	Complete	
Do you have responsible sourcing strategy policy publicly available on your website? (None - if you do not list specify the URL in the comment field) (*)	Yes	Complete	
The URL in the comment field	https://www.erasteel.com/wp-content/uploads/2022/10/20230124_ES-2023-ES-02672857-Compliance-Letter-RL-FR	Complete	
Do you require your direct suppliers to adhere to the STC from countries whose dual diligence practices have been validated by an independent third party body? (None) (*)	No	Complete	
Do you implement due diligence measures for responsible sourcing? (*)	Yes	Complete	
Does your company conduct Conflict Minerals surveys of your relevant suppliers? (*)	Yes, in accordance with IPCJ725 (i.e., CMRT)	Complete	
Do you receive due diligence information received from your suppliers against your company's requirements? (*)	Yes	Complete	
Does your review process include corrective action management? (*)	No	Complete	
Do you have a process to file an annual conflict minerals disclosure? (*)	No	Complete	
Conflict List	No products or item numbers listed	Complete	
Conflict List - Titanium		Complete	
Conflict List - Fe		Complete	
Conflict List - Cu		Complete	
Conflict List - Tungsten		Complete	
Do you have any subcontractors or suppliers? (*)			

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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 dropdowns 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	Mellerus Osterbotten							
CID003403	Cobalt	Glencore Nikkelverk Refinery		NORWAY	CID003403	RMI		Kristiansand	Aust-Agder						No	
CID003278	Cobalt	Sumitomo Metal Mining		JAPAN	CID003278	RMI		Nihama	Ehime						No	
CID003239	Cobalt	Port Colborne Refinery		CANADA	CID003239	RMI		Port Colborne	Ontario						No	
CID003232	Cobalt	Dynatec 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		Tazenokht	Drba-Tafilalet						No	
CID003390	Cobalt	NORILSK NICKEL HARJAVALTA OY		FINLAND	CID003390	RMI		Harjavalta	Satakunta						No	