

Conflict Minerals Sourcing Policy

ARCUS Elektrotechnik Alois Schiffmann GmbH is committed to sourcing components and materials from suppliers that share our respect for human rights, ethics and the protection of the environment.

In August 2012, the United States Securities and Exchange Commission (“SEC”) issued its final rules regarding “Conflict Minerals” (known as ‘3TG’ – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

The Dodd-Frank Act requires publicly-traded companies to disclose any minerals used to fund extreme violence in the Democratic Republic of Congo (“DRC”) and adjoining regions that are necessary for the functionality or production of products they manufacture.

As a privately-held company in Germany, ARCUS is not subject to the SEC disclosure requirement of the Dodd-Frank Act.

However, ARCUS is committed to ensuring the health, safety and protection of people who come into contact with our products and business, and we demand high social, environmental and human rights standards among our suppliers.

Managing our obligations in relation to Conflict Minerals is a part of this corporate responsibility.

We expect that our suppliers will comply with our requirements to provide statements and perform in due diligence about the source of any conflict mineral in their products they provide to us.

We also demand that our suppliers take similar measures with their suppliers to ensure alignment throughout the supply chain.

We evaluate our relationships with our suppliers on an ongoing basis, and we reserve the right to evaluate the extent to which a supplier has failed to reasonably comply with this ARCUS Conflict Minerals Sourcing Policy. If we determine that a supplier’s efforts are deficient, we reserve the right to reevaluate the supplier relationship and to take any appropriate action, including terminating our relationship with the supplier.

Munich, March 2017
ARCUS Elektrotechnik
Alois Schiffmann GmbH