
Conflict Minerals Sourcing Policy

„Conflict minerals“¹ originating from the Democratic Republic of the Congo (DRC) and the surrounding countries are sometimes mined and sold, “under the control of armed groups”², to “finance conflict characterized by extreme levels of violence”². Some of these minerals can make their way into the supply chains of the products used around the world, including those in the electronics industry. STS’s suppliers acquire and use conflict minerals from multiple sources worldwide. As part of STS’s commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is STS’s goal to use tantalum, tin, tungsten and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region.

STS expects our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict minerals are DRC conflict free³. STS expects our suppliers to comply with the Electronics Industry Citizenship Coalition (EICC) Code of Conduct and conduct their business in alignment with STS’s supply chain responsibility expectations.

In support of this policy, STS will:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk-Areas and encourage our suppliers to do likewise with their suppliers.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the tantalum, tin, tungsten and gold in our supply-chain are “conflict-free”⁴.
- Collaborate with our suppliers and others on industry-wide solutions to enable products that are DRC conflict free.
- Commit to transparency in the implementation of this policy by making available reports.

To provide feedback on the content or execution of this policy, please contact STS through the following contact details: info@sts-trafo.de

1. “Conflict minerals” as defined by Securities and Exchange Commission (SEC) rules is a broad term which means columbite-tantaline (coltan), cassiterite, gold, wolframite or their derivatives which are limited to tantalum, tin or tungsten, regardless of whether these minerals finance conflict in the DRC or adjoin countries.
2. Dodd-Frank Act Section 1502.
3. DRC conflict free “means that a product does not contain minerals necessary to the functionality or production of that product that directly and indirectly finance or benefit armed groups” as defined SEC-Rule 13p-1 under the Securities Exchange Act of 1934
4. We use the term “conflict-free” in a boarder sense to refer to suppliers, supply chains, smelters and refiners whose sourced of conflict minerals did not or do not directly or indirectly finance or benefit armed groups in the DRC or adjoin countries. Regarding STS checks, STS is only using tin-solder and soldering wire. This materials have an amount of only 0,3% in the overall product.