



To whom it may concern,

Paris, May 13<sup>th</sup> 2024

RE: 2024-05-13-COUR 01/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 6.4  
 April 26, 2024

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:	
Company Unique ID:	352 849 13700067
Company Unique ID Authority:	CFE - RCS Paris - France
Address:	100 Avenue de Suffren - 75015 PARIS - FRANCE
Contact Name (*):	ROCABOIS Philippe
Email - Contact (*):	philippe.rocabois@erasteel.com
Phone - Contact (*):	+33788302734
Authorizer (*):	ROCABOIS Philippe
Title - Authorizer:	Technical and metallurgical director
Email - Authorizer (*):	philippe.rocabois@erasteel.com
Phone - Authorizer:	
Effective Date (*):	13-May-2024

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

2) Does any 3TG remain in the product(s)? (*)		
Tantalum		Comments
Tin		
Gold		
Tungsten (*)	Yes	

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)		
Tantalum		Comments
Tin		
Gold		
Tungsten (*)	No	

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)		
Tantalum		Comments
Tin		
Gold		
Tungsten (*)	No	

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)		
Tantalum		Comments
Tin		
Gold		
Tungsten (*)	No	

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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	Clearly specified in our general conditions of supply
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	<a href="https://www.erasteel.com/documents/">https://www.erasteel.com/documents/</a>
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., CM	
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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 Wählen sie hier die Sprache:

**Extended Mineral Reporting Template (EMRT)**

English

Revision 1.3  
April 26, 2024

[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 13700067
Company Unique ID Authority:	CFE, RCS Paris - France
Address:	100 avenue de Suffren - 750 15 PARIS - FRANCE
Contact Name (*)	ROCABOIS Philippe <a href="mailto:philippe.rocabois@erasteel.com">philippe.rocabois@erasteel.com</a>
Email - Contact (*)	
Phone - Contact (*)	+33788302734
Authorizer (*)	ROCABOIS Philippe
Title - Authorizer:	Technical and metallurgical director
Email - Authorizer (*)	<a href="mailto:philippe.rocabois@erasteel.com">philippe.rocabois@erasteel.com</a>
Phone - Authorizer:	
Effective Date (*)	13-May-2024

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? (\*)
 

Cobalt(*)	Answer	Comments
	Yes	
	No	
  
- 2) Does any cobalt or natural mica remain in the product(s)? (\*)
 

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

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

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

Cobalt(*)	Answer	Comments
	Yes	
	No	
  
- 7) Has all applicable smelter or processor information received by your company been reported in this declaration? (\*)
 

Cobalt(*)	Answer	Comments
	Yes	
	No	

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 19-June-2023 and it forbides supply from 3TC 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	<a href="https://www.erasteel.com/wp-content/uploads/2023/02/20230104_ES-2023_01_CMR/EMRT_Compliance-Letter_KI_EN-1.pdf">https://www.erasteel.com/wp-content/uploads/2023/02/20230104_ES-2023_01_CMR/EMRT_Compliance-Letter_KI_EN-1.pdf</a> ...It will be updated before 15-June-2024
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(*) Mica	No 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 IPC1755 (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 customer 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	HypersRisk to source
Company Name (*)	Erasteel Koster AB	Complete	
Declaration Scope or Class (*)	A-Company	Complete	
Contact Name (*)	KOOB/QS Philippe	Complete	
Email - Contact (*)	philippe.koob@erasteel.com	Complete	
Phone - Contact (*)	+3378300734	Complete	
Address (*)	KOOB/QS Philippe	Complete	
Email - Address (*)	philippe.koob@erasteel.com	Complete	
Effective Date (*)	13-May-2024	Complete	
1) Do any of the suppliers in your supply chain source the 2023 from the covered operations (CO, open, and sub-processes) (*)			
True/False	no	Complete	
Yes	no	Complete	
Sold	no	Complete	
Targeted (*)	yes	Complete	
2) Does any 2023 remain in the product(s) (*)			
True/False		Complete	
Yes		Complete	
Sold		Complete	
Targeted (*)	yes	Complete	
3) Do any of the suppliers in your supply chain source the 2023 from the covered operations (CO, open, and sub-processes) (*)			
True/False		Complete	
Yes		Complete	
Sold		Complete	
Targeted (*)	no	Complete	
4) Do any of the suppliers in your supply chain source the 2023 from covered operations and high risk areas (*)			
True/False		Complete	
Yes		Complete	
Sold		Complete	
Targeted (*)	no	Complete	
5) Does the parent of the 2023 processor for the commodity in production of your previously imported item provide an ISO 26000 (*)			
True/False		Complete	
Yes		Complete	
Sold		Complete	
Targeted (*)	no	Complete	
6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)			
True/False		Complete	
Yes		Complete	
Sold		Complete	
Targeted (*)	100%	Complete	
7) Have you identified all of the suppliers supplying the 2023 to your supply chain? (*)			
True/False		Complete	
Yes		Complete	
Sold		Complete	
Targeted (*)	yes	Complete	
8) Has all applicable supplier information received by your company been reported in this declaration? (*)			
True/False		Complete	
Yes		Complete	
Sold		Complete	
Targeted (*)	yes	Complete	
A. Have you established a responsible minerals sourcing policy? (*)	yes	Complete	
B. Is your responsible minerals sourcing policy publicly available on your website? (Yes = Yes, the user shall specify the URL in the comment field.) (*)	yes	Complete	
The URL in the comment field	<a href="https://www.erasteel.com/documents/">https://www.erasteel.com/documents/</a>	Complete	
C. Do you require your direct suppliers to source the 2023 from suppliers whose due diligence practices have been validated by an independent third party audit organization? (*)	yes	Complete	
D. Have you implemented due diligence measures for responsible sourcing? (*)	yes	Complete	
E. Does your company conduct Conflict Minerals surveys of your relevant supplier(s)? (*)	yes, in accordance with DDCI/20 (e.g., QRRT)	Complete	
F. Do you receive due diligence information received from your suppliers against your company's standards? (*)	yes	Complete	
G. Does your review process include corrective action implementation? (*)	no	Complete	
H. Is your company required to file an annual conflict minerals disclosure? (*)	no	Complete	
Product List	No products or item numbers listed	Complete	
Supplier List - Titanium		Complete	
Supplier List - Fe		Complete	
Supplier List - Gold		Complete	
Supplier List - Tungsten		Complete	
Unreported Supplier(s) (Name, Address, Location)		Yes	

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**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 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](mailto:RMI@responsiblebusiness.org).

Smelter Identification Number Input Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City
	Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.		CHINA	CID002315	RMI		Ganzhou
	Tungsten	Asia Tungsten Products Vietnam Ltd.		VIET NAM	CID002502	RMI		Vinh Bao District
	Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.		CHINA	CID004430	RMI		Longyan

**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](mailto:RMI@ResponsibleBusiness.org).

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Smelter Identification Number Input Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City
	Cobalt	Freeport Kokkola		FINLAND	CID003226	RMI		Kokkola
	Cobalt	Sumitomo Metal Mining		JAPAN	CID003278	RMI		Niihama
	Cobalt	Port Colborne Refinery		CANADA	CID003239	RMI		Port Colborne
	Cobalt	Dynatec Madagascar Company		MADAGASCAR	CID003232	RMI		Toamasina
	Cobalt	Murrin Murrin Nickel Cobalt Plant		AUSTRALIA	CID003406	RMI		Laverton
	Cobalt	NORILSK NICKEL HARJAVALTA OY		FINLAND	CID003390	RMI		Harjavalta