

Conflict Minerals

Thomas GmbH · Industriestraße 6 · 63505 Langenselbold

Date: 13.11.2023

Statement on Materials from Conflict Zones

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“U.S. Conflict Minerals Law”), issued by the U.S. Securities and Exchange Commission became effective on 21st July 2010. This law defines conflict minerals as certain minerals originating from the *Democratic Republic of Congo* (“DRC”) or adjoining countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia). Companies are required to report the use of any “conflict minerals” originating from the DRC or adjoining countries. These minerals include *Cassiterite* and its derivate *Tin* that might be used for the production of tinplate steel.

Thomas Group hereby confirms that we purchase only materials and components that comply with national and international laws and conventions. Therefore **Thomas Group** does not use any “conflict minerals” as defined in the *U.S. Conflict Minerals Law* that finance armed conflicts and human right abuses.

Thomas Group maintains due diligence processes to support compliance with this commitment and request the relevant raw material suppliers to fully support its due diligence efforts.

Thomas Group also participates in the “RMI” (Responsible Materials Initiative) program by annual issue of the “CMRT” (Conflict Minerals Reporting Template) which shows information about the supply chains for “3TG” (Tantalum, Tin, Tungsten, Gold) materials.



 **Thomas GmbH**
Industriestraße 6
63505 Langenselbold
Germany

i.v. 

Langenselbold, 13.11.2023



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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 (*):	Thomas Group - Thomas GmbH
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	Industriestrasse 6, 63505 Langenselbold, Germany
Contact Name (*):	Gebhard Schmidt
Email - Contact (*):	gebhard.schmidt@thomas-holding.com
Phone - Contact (*):	+496184807153
Authorizer (*):	Gebhard Schmidt
Title - Authorizer:	Quality Manager
Email - Authorizer (*):	gebhard.schmidt@thomas-holding.com
Phone - Authorizer:	+496184807153
Effective Date (*):	13-Nov-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 (*)	Yes	
Gold	No	
Tungsten	No	

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

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 (*)	No	
Gold		
Tungsten		

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

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 (*)	No	
Gold		
Tungsten		

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin (*)	100%	
Gold		
Tungsten		

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum		
Tin (*)	Yes	
Gold		
Tungsten		



Conflict Minerals Reporting Template (CMRT)

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8) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin (*)	Yes	
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	
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.thomas-holding.com/de/
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	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., 4	
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? (*)	Yes	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	

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



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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
CID000468	Tin	Fenix Metals		POLAND	CID000468	RMI		Chmielów
CID001173	Tin	Mineracao Taboca S.A.		BRAZIL	CID001173	RMI		Bairro Guarapiranga
CID001182	Tin	Minsur		PERU	CID001182	RMI		Paracas
CID001337	Tin	Operaciones Metalurgicas S.A.		BOLIVIA (PLURINATIONAL STATE)	CID001337	RMI		Oruro
CID001898	Tin	Thaisarco		THAILAND	CID001898	RMI		Amphur Muang
CID002773	Tin	Aurubis Beerse		BELGIUM	CID002773	RMI		Beerse
CID000438	Tin	EM Vinto		BOLIVIA (PLURINATIONAL STATE)	CID000438	RMI		Oruro
CID002036	Tin	White Solder Metalurgia e Mineracao Ltda.		BRAZIL	CID002036	RMI		Ariquemes
CID001406	Tin	PT Babel Surya Alam Lestari		INDONESIA	CID001406	RMI		Badau
CID001458	Tin	PT Prima Timah Utama		INDONESIA	CID001458	RMI		Pangkal Pinang
CID002774	Tin	Aurubis Berango		SPAIN	CID002774	RMI		Berango
CID001482	Tin	PT Timah Tbk Mentok		INDONESIA	CID001482	RMI		Mentok
CID001477	Tin	PT Timah Tbk Kundur		INDONESIA	CID001477	RMI		Kundur
CID002180	Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.		CHINA	CID002180	RMI		Gejiu
CID003582	Tin	Fabrica Auricchio Industria e Comercio Ltda.		BRAZIL	CID003582	RMI		Mogi das Cruzes
CID001070	Tin	China Tin Group Co., Ltd.		CHINA	CID001070	RMI		Laibin
CID001105	Tin	Malaysia Smelting Corporation (MSC)		MALAYSIA	CID001105	RMI		Butterworth
CID001231	Tin	Jiangxi New Nanshan Technology Ltd.		CHINA	CID001231	RMI		Ganzhou
CID001399	Tin	PT Artha Cipta Langgeng		INDONESIA	CID001399	RMI		Sungailiat
CID001453	Tin	PT Mitra Stania Prima		INDONESIA	CID001453	RMI		Sungailiat
CID001460	Tin	PT Refined Bangka Tin		INDONESIA	CID001460	RMI		Sungailiat
CID001490	Tin	PT Tinindo Inter Nusa		INDONESIA	CID001490	RMI		Pangkal Pinang
CID002503	Tin	PT ATD Makmur Mandiri Jaya		INDONESIA	CID002503	RMI		Sungailiat
CID002774	Tin	Aurubis Berango		SPAIN	CID002774	RMI		Berango
CID002835	Tin	PT Menara Cipta Mulia		INDONESIA	CID002835	RMI		Mentawak
CID003205	Tin	PT Bangka Serumpun		INDONESIA	CID003205	RMI		Pangkalpinang
CID003325	Tin	Tin Technology & Refining		UNITED STATES OF AMERICA	CID003325	RMI		West Chester
CID003381	Tin	PT Rajawali Rimba Perkasa		INDONESIA	CID003381	RMI		Tukak Sadai
CID001314	Tin	O.M. Manufacturing (Thailand) Co., Ltd.		THAILAND	CID001314	RMI		Nongkham Sriracha
CID001539	Tin	Rui Da Hung		TAIWAN, PROVINCE OF CHINA	CID001539	RMI		Longtan Shiang Taoyuan