

## Statement on Materials from Conflict Zones

The 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 21<sup>st</sup> 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 GmbH** hereby confirms that we purchase only materials and components that comply with national and international laws and conventions. Therefore **Thomas GmbH** does not use any "conflict minerals" as defined in the *U.S. Conflict Minerals Law* that finance armed conflicts and human right abuses.

**Thomas GmbH** 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 GmbH** 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

  
Langenselbold, 17.10.2022

 <p><b>Select Language Preference Here:</b>          请选择你的语言:          서울을 언어를 선택하십시오:          貴社言語をここから選択してください:  <b>Sélectionner la langue préférée ici:</b>  <b>Seleccione Preferencia de idioma Aquí:</b>  <b>Wählen sie hier die Sprache:</b>  <b>Selezione el lenguaje de preferencia aquí:</b>  <b>Selezionare la lingua di preferenza qui:</b>  <b>Burada Dil Tercihini Belirlewin:</b></p>	<h3>Conflict Minerals Reporting Template (CMRT)</h3>															
Revision 6.22 May 11, 2022 <a href="#">Link to Terms &amp; Conditions</a>																
The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.																
<b>Company Information</b>																
<b>Company Name (*):</b> <b>Declaration Scope or Class (*):</b> <b>Description of Scope:</b> <b>Company Unique ID:</b> <b>Company Unique ID Authority:</b> <b>Address:</b> <b>Contact Name (*):</b> <b>Email - Contact (*):</b> <b>Phone - Contact (*):</b> <b>Authorizer (*):</b> <b>Title - Authorizer:</b> <b>Email - Authorizer (*):</b> <b>Phone - Authorizer:</b> <b>Effective Date (*):</b>	Thomas Group - Thomas GmbH A. Company  Industriestrasse 6, 63505 Langenselbold, Germany Gebhard Schmidt <a href="mailto:gebhard.schmidt@thomas-holding.com">gebhard.schmidt@thomas-holding.com</a> +496184807153 Gebhard Schmidt Quality Manager <a href="mailto:gebhard.schmidt@thomas-holding.com">gebhard.schmidt@thomas-holding.com</a> +496184807153 14-Oct-2022															
Answer the following questions 1 - 8 based on the declaration scope indicated above																
<b>1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">Answer</th> <th style="width: 40%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Tantalum</td> <td>No</td> <td></td> </tr> <tr> <td>Tin (*)</td> <td>Yes</td> <td></td> </tr> <tr> <td>Gold</td> <td>No</td> <td></td> </tr> <tr> <td>Tungsten</td> <td>No</td> <td></td> </tr> </tbody> </table>		Answer	Comments	Tantalum	No		Tin (*)	Yes		Gold	No		Tungsten	No	
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<b>2) Does any 3TG remain in the product(s)? (*)</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">Answer</th> <th style="width: 40%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Tantalum</td> <td></td> <td></td> </tr> <tr> <td>Tin (*)</td> <td>Yes</td> <td></td> </tr> <tr> <td>Gold</td> <td></td> <td></td> </tr> <tr> <td>Tungsten</td> <td></td> <td></td> </tr> </tbody> </table>		Answer	Comments	Tantalum			Tin (*)	Yes		Gold			Tungsten		
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<b>3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">Answer</th> <th style="width: 40%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Tantalum</td> <td></td> <td></td> </tr> <tr> <td>Tin (*)</td> <td>No</td> <td></td> </tr> <tr> <td>Gold</td> <td></td> <td></td> </tr> <tr> <td>Tungsten</td> <td></td> <td></td> </tr> </tbody> </table>		Answer	Comments	Tantalum			Tin (*)	No		Gold			Tungsten		
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<b>4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">Answer</th> <th style="width: 40%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Tantalum</td> <td></td> <td></td> </tr> <tr> <td>Tin (*)</td> <td>No</td> <td></td> </tr> <tr> <td>Gold</td> <td></td> <td></td> </tr> <tr> <td>Tungsten</td> <td></td> <td></td> </tr> </tbody> </table>		Answer	Comments	Tantalum			Tin (*)	No		Gold			Tungsten		
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<b>5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">Answer</th> <th style="width: 40%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Tantalum</td> <td></td> <td></td> </tr> <tr> <td>Tin (*)</td> <td>No</td> <td></td> </tr> <tr> <td>Gold</td> <td></td> <td></td> </tr> <tr> <td>Tungsten</td> <td></td> <td></td> </tr> </tbody> </table>		Answer	Comments	Tantalum			Tin (*)	No		Gold			Tungsten		
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<b>6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">Answer</th> <th style="width: 40%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Tantalum</td> <td></td> <td></td> </tr> <tr> <td>Tin (*)</td> <td>100%</td> <td></td> </tr> <tr> <td>Gold</td> <td></td> <td></td> </tr> <tr> <td>Tungsten</td> <td></td> <td></td> </tr> </tbody> </table>		Answer	Comments	Tantalum			Tin (*)	100%		Gold			Tungsten		
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<b>7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">Answer</th> <th style="width: 40%;">Comments</th> </tr> </thead> <tbody> <tr> <td>Tantalum</td> <td></td> <td></td> </tr> <tr> <td>Tin (*)</td> <td>Yes</td> <td></td> </tr> <tr> <td>Gold</td> <td></td> <td></td> </tr> <tr> <td>Tungsten</td> <td></td> <td></td> </tr> </tbody> </table>		Answer	Comments	Tantalum			Tin (*)	Yes		Gold			Tungsten		
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## Conflict Minerals

Thomas GmbH · Industriestraße 6 · 63505 Langenselbold

Date: 19.10.2022

8) Has all applicable smelter information received by your company been reported in this declaration? (*)		
	Answer	Comments
<b>Tantalum</b>		
<b>Tin (*)</b>	Yes	
<b>Gold</b>		
<b>Tungsten</b>		

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	<a href="https://www.thomas-holding.com/de/">https://www.thomas-holding.com/de/</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	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., C	
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	

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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 [contact@rmi.thomasonlinebusiness.com](mailto:contact@rmi.thomasonlinebusiness.com).



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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
CID001337	Tin	Operaciones Metalurgicas S.A.		BOLIVIA (PLURINATIONAL STATE OF)	CID001337	RMI		Oruro
CID001182	Tin	Minsur		PERU	CID001182	RMI		Paracas
CID001173	Tin	Mineracao Taboca S.A.		BRAZIL	CID001173	RMI		Bairro Guarapiranga
CID001898	Tin	Thaisarco		THAILAND	CID001898	RMI		Amphur Muang
CID001105	Tin	Malaysia Smelting Corporation (MSC)		MALAYSIA	CID001105	RMI		Butterworth
CID001490	Tin	PT Tinindo Inter Nusa		INDONESIA	CID001490	RMI		Pangkal Pinang
CID001458	Tin	PT Prima Timah Utama		INDONESIA	CID001458	RMI		Pangkal Pinang
CID001428	Tin	PT Bukit Timah		INDONESIA	CID001428	RMI		Pangkal Pinang
CID001421	Tin	PT Beltung Industri Sejahtera		INDONESIA	CID001421	RMI		Pegantungan
CID002835	Tin	PT Menara Cipta Mulia		INDONESIA	CID002835	RMI		Mentawak
CID002773	Tin	Metallo Belgium N.V.		BELGIUM	CID002773	RMI		Beerse
CID000309	Tin	PT Aries Kencana Sejahtera		INDONESIA	CID000309	RMI		Pemali
CID001482	Tin	PT Timah Tbk Mentok		INDONESIA	CID001482	RMI		Mentok
CID001477	Tin	PT Timah Tbk Kundur		INDONESIA	CID001477	RMI		Kundur
CID002036	Tin	White Solder Metalurgia e Mineracao Ltda.		BRAZIL	CID002036	RMI		Ariquemes
CID001460	Tin	PT Refined Bangka Tin		INDONESIA	CID001460	RMI		Sungailiat
CID000468	Tin	Fenix Metals		POLAND	CID000468	RMI		Chmielów
CID001070	Tin	China Tin Group Co., Ltd.		CHINA	CID001070	RMI		Laibin
CID002180	Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.		CHINA	CID002180	RMI		Geju
CID001453	Tin	PT Mitra Stania Prima		INDONESIA	CID001453	RMI		Sungailiat
CID000438	Tin	EM Vinto		BOLIVIA (PLURINATIONAL STATE OF)	CID000438	RMI		Oruro
CID001457	Tin	PT Panca Mega Persada		INDONESIA	CID001457	RMI		Sungailiat
CID001493	Tin	PT Tommy Utama		INDONESIA	CID001493	RMI		Sumping Desa Batu Peyu
CID002158	Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.		CHINA	CID002158	RMI		Geju
CID003116	Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.		CHINA	CID003116	RMI		Chaozhou
CID001463	Tin	PT Sariwiguna Binasentosa		INDONESIA	CID001463	RMI		Pangkal Pinang
CID003205	Tin	PT Bangka Serumpun		INDONESIA	CID003205	RMI		Pangkalpinang