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Policy - Conflict minerals & Cobalt

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Bulten strives to be a good corporate citizen. We are committed to ensuring the health, safety and protection of people who come into contact with our products and business, we require high social, environmental and human rights standards among our suppliers and we support efforts by our interested parties to reach our common objectives to build up a socially and responsible supply chain.

Conflict Minerals

Bulten is committed to comply with the underlying rules and regulations surrounding "conflict minerals" (such as the Dodd-Frank Wall Street Reform and Consumer Protection Act) to enable all Bulten products as "conflict free".

As stated in Bulten's Code of Conduct for Suppliers and Business Partners, each of Bulten's business partners and suppliers (hereinafter referred to as "Bulten partners") shall adopt appropriate and reliable measures which ensure, to the best of the Bulten partner's knowledge and belief, that certain materials (tantalum, tin, tungsten, gold and other conflict minerals) used in the manufacture of its products do not directly or indirectly serve as means to finance or support armed groups that commit serious human rights violations. The Bulten partner shall exercise due diligence with respect to the origin and chain of custody of conflict minerals and shall inform Bulten about the use of such minerals and its origin including disclose precautionary measures to Bulten regularly.

Cobalt

Bulten is also committed to ensure responsible sourcing of cobalt. In addition to the above, Bulten has therefore adopted the principles of the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' (hereinafter referred to as "the OECD Due Diligence Guidance").

While sourcing cobalt from, or operating in, conflict-affected and high-risk areas, Bulten expects its business partners to adopt and comply with the principles of the OECD Due Diligence Guidance. The Bulten partner shall exercise due diligence with respect to the origin and chain of custody of Cobalt and shall inform Bulten about the use of Cobalt and its origin including disclose precautionary measures to Bulten regularly.

In support of this policy, Bulten will:

- Implement procedures compliant with and in support of the activities of the OECD Due Diligence Guidance and EICC-GeSI Conflict Free Sourcing Initiative.
- Endeavour to trace the minerals back to the source by using the EICC- GeSI Conflict Minerals Reporting and Cobalt Reporting Templates.
- Require our suppliers to submit the EICC- GeSI Conflict Minerals Reporting and Cobalt Reporting Templates.