

Policy on Responsible Minerals Sourcing

As one of the market leaders of a system supplier for customized Medtech solutions the GPE Group (NICOLAY GmbH) is committed to ensure the safety, health and protection of people and the environment everywhere in the world.

As required by the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 ("Conflict Minerals Act"), GPE Group (NICOLAY GmbH) is working with their suppliers to confirm that their supplies of material do not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC), an adjoining country or other Conflict Affected and High Risk Areas worldwide. The metals of concern are at least tin, tantalum, tungsten and gold.

The GPE Group (NICOLAY GmbH) will not knowingly purchase material supplies that contain Conflict Minerals of the above mentioned countries. Due to the complexity of the routes by which metals, and in particular precious metals, are smelted, recycled and sold, including the common practice of commingling ores and scrap from many different sources, it is often impossible for any company to obtain full traceability to an exact origin at all.

However, we have established a risk management by taking continuous action like working with CMRT's (Conflict Mineral Reporting Table) to seek to ensure that minerals from the conflict region do not enter our supply chain, including obtaining reliable certificates of origin for all materials that might possibly originate in conflict areas or adjacent countries.

We are committed to comply with the OECD Annex II Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and recognizing that we have the responsibility to respect human rights and not contribute to conflict, this also includes the areas of:

- Serious abuses associated with the extraction, transport or trade of minerals
- Direct or indirect support to non-state armed groups
- Public or private security forces
- Bribery and fraudulent misrepresentation of the origin of minerals
- Money laundering
- Payment of taxes, fees and royalties due to governments

If you have specific questions or any additional information is required, please contact your GPE Group partner.

GPE Group (NICOLAY GmbH)


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