

## Statement of Bender GmbH & Co. KG on “Conflict Minerals” in our products

### Dodd-Frank-Act - Section 1502

The US Dodd-Frank Act has been legally binding since July 2010. The Dodd-Frank Act is primarily intended to reform U.S. financial market law. However, it also includes disclosure and reporting requirements for U.S.-listed companies regarding the use of certain raw materials originating in the Democratic Republic (DR) of Congo or its neighbouring countries. Under “Section 1502” Dodd-Frank Act, companies required to report under the U.S. Securities Exchange Act must disclose annually whether so-called “conflict minerals” necessary for the manufacture or function of their products originate in the DR Congo or its neighbouring countries. The Dodd-Frank Act defines the term “conflict minerals” to mean the commodities tantalum, tin, gold, and tungsten if their extraction and trade contribute to the financing or otherwise supporting of armed groups in the DR Congo or its neighbouring states. The aim of this regulation is to stop the financing of armed groups in the DR Congo through raw materials extraction and trade.

### EU Regulation 2017/821

Since 01 January 2021, the EU Regulation 2017/821 has resulted in new requirements for EU importers of tin, tantalum, tungsten and gold. As part of a due diligence process, importing companies must verify whether these minerals originate from conflict and high-risk areas and publish the results of this verification annually. This regulation also aims to curb trade in these four commodities in conflict and high-risk areas to prevent the financing of armed conflict and forced labour.

### Statement of Bender

We, Bender GmbH & Co. KG, have no legal obligation to comply with the conflict minerals requirements of “Section 1502” of the Dodd-Frank Act. EU Regulation 2017/821 also provides for a limited scope of application and is initially aimed at companies that import raw materials (unprocessed ores or their concentrates) into the EU. Bender currently does not import any raw materials into the EU. Therefore, the EU Regulation 2017/821 is not binding for us.

However, we are aware of our social responsibility and therefore assess our supply chain with regard to conflict minerals using the “Conflict Minerals Reporting Template” (CMRT) developed by the Conflict-Free Sourcing Initiative (CFSI) to identify the country of origin of the mineral as well as the smelters and refineries involved. Our information in the “Conflict Minerals Reporting Template” is primarily based on information from our pre-suppliers. In support of this, we use the information from the “Silicon Expert” database to obtain further information on conflict minerals directly from the producers and manufacturers. We already take this information into account when selecting our components.

Due to the continuously increasing number of inquiries and the effort involved, we are unfortunately unable to respond to individual questions and examine each case in detail. We therefore ask for your understanding that we do not process special questionnaires, lists, forms or web portals on the topic of “conflict minerals”. We provide the „Conflict Minerals Reporting Template“ in the download area on our homepage ([www.bender.de](http://www.bender.de)).



**Heinz Nowicki**  
(General Manager / CSO)



**p.p. Jens Schäfer**  
(Head of Quality)