

Supply Chain Policy for Conflict Minerals



IMR METAL POWDER
TECHNOLOGIES

IMR Metal Powder Technologies GmbH (hereinafter referred to as “IMR”) is part of the IMR© Group and is engaged in the metals trade and the production of semi-finished metal products, alloys, granules and metal powders, principally on the basis of raw materials such as zinc, lead, tin and aluminium.

We are committed to doing business exclusively and without exception from an ethically sound perspective.

The rules of conduct for the management and employees are set out in the IMR Code of Conduct.

On 8 June 2017, Regulation (EU) 2017/821 of the European Parliament came into force, which from 1 January 2021 lays down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas. Risks in terms of their supply chains must be identified and suitable measures put in place to minimise these.

IMR is affected by these requirements with regard to the procurement of tin metal for its own processes and as a commodity.

In order to fulfil the specific requirements with regard to procuring conflict-free tin metal and its own standards from the Code of Conduct, a comprehensive programme has been launched at IMR to implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk areas. This programme will serve to continuously improve IMR’s internal processes and its communication with actors in the supply chain, and thus constitutes an important contribution to achieving this objective.

Suppliers wishing to supply tin metal to IMR are therefore requested among other things to:

- inform us of their own supply policy for conflict minerals
- provide us with information on the structure of their management system in respect of conflict minerals
- let us know their contact point with regard to questions and/or complaints about conflict minerals
- send us any reports that have been disclosed about their company's due diligence obligation

To ensure that it meets its obligations from the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk areas, IMR procures tin metal exclusively from manufacturers listed with the RMI or manufacturers that are able to present a valid CMRT.

If the direct supplier is not the manufacturer itself – e.g. a dealer – the requirement for the origin of the material will be explicitly regulated in the purchase contract.

In the event of a risk being identified in the supply chain, IMR will take suitable measures that have been prepared previously during the course of the risk analysis for conflict materials.

IMR Metal Powder Technologies GmbH is also a member of the RTS – Responsible Tin Supply Group – an organisation of the ITRI (International Tin Association), and is thus integrated into the ongoing activities for compliance with the minimum standards prescribed by the OECD.

We encourage all potential interest groups to express any concerns in respect of our supply chain, and offer them the option of contacting our Compliance Hotline in this respect

Protection of whistleblowers:

IMR guarantees the integrity of the data received and compliance with all data protection regulations. The confidentiality of the data received and the protection of whistleblowers from retaliation are guaranteed.

Contact the Compliance Hotline: Email: conflictminerals@imr-metalle.com
 Telephone: +43 4274 4100 - 119

Lind ob Velden, October 2022