

Opinion in accordance with Regulation (EU) 2017/821, Articles 4-7, Conflict minerals

Responsible for the content:

FRIMECO Produktions GmbH

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1. Company overview

FRIMECO has been producing and marketing high quality materials for the international friction industry, delivering from our global manufacturing facilities to more than 30 countries worldwide.

FRIMECO products are used for friction linings in the automotive, railroad and industrial sectors.

2. Supply chain policy (Art. 4, Regulation (EU) 2017/821)

FRIMECO Produktions GmbH buys tin raw material exclusively from publicly known Union importers in the EU internal market and processes it to semi-manufactured and end products within the company group. Strict care is taken to ensure that only tin from RMI (Responsible Minerals Initiative) audited / listed smelters is purchased as part of the company's own procurement. This process is ensured by the following measures, among others:

- Frimeco's "Supply Chain Policies" strategy, which is defined by the management and implemented within the Frimeco Group.
- Frimeco's "Conflict Minerals" strategy, which sets out requirements for suppliers and is part of contractual documents.
- Control of every tin delivery regarding CMRT (Conflict Minerals Reporting Template).
- Staff training
- Internal audits

3. Risk management and due diligence obligations (Art. 5, Regulation (EU) 2017/821)

At Frimeco, the procurement of tin and the contractual arrangements for tin metal / ingots are the direct responsibility of the Management Board and the senior management team in direct contact with the Management Board. In order to implement risk management and fulfill due diligence obligations:

- appropriate specification documentation was/is/will be established to implement the specified conflict minerals strategy
- regular internal audits were / are / will be introduced
- staff in the incoming goods and logistics departments were / are / will be regularly trained
- a measure has been imposed – to purchase tin exclusively from Union importers – that de facto excludes the purchase of tin from conflict regions or high-risk areas

- a further barrier was introduced to exclude tin supplies from conflict regions: checking the CMRT documents of the tin raw material supplied (checking whether only RMI-listed manufacturers are listed as sources of supply)
- a further measure was taken to exclude a purchase from critical sources: monitoring the supply policy of the Union importers / contractual partners of Frimeco Produktions GmbH in the form of mailings / publications of the contractual partner, but also in the form of personal discussions, etc.

Frimeco points out that these principles apply to all locations and the entire Group logistics.

4. **Disclosure obligation (Art. 7 Regulation (EU) 2017/821)**

Frimeco Produktions GmbH fulfills its obligations as a Union importer of tin powder.

The publication of this document on the Frimeco homepage allows the public to assess Frimeco's efforts regarding responsible procurement and to submit comments / remarks / complaints to Frimeco via office@frimeco.com, whereby an attempt will be made to answer these to the best of our knowledge and to incorporate suggestions.

Frimeco has communicated these principles internally and externally.

The management of Frimeco Produktions GmbH