

Conflict Minerals Guideline

The U.S. Dodd-Frank Act (Dodd-Frank Wall Street Reform and Consumer Protection Act) has been legally binding since July 2010. Section 1502 of the Dodd-Frank Act requires companies subject to reporting requirements under the U.S. Securities Exchange Act to disclose annually to the U.S. Securities and Exchange Commission (SEC) whether any so-called “conflict minerals” originating in the DRC or its neighboring countries are used in their products or manufacturing processes.

Currently, tantalum, tin, tungsten, their ores (cassiterite, columbite-tantalite, and wolframite), and gold, also known as “3TG”, are designated as conflict minerals. Cobalt, mica, copper, graphite, lithium and nickel are defined as extended conflict minerals.

ODU is not listed on a U.S. exchange and is therefore not subject to any legal obligations in this regard. Nevertheless, we expressly acknowledge – and voluntarily ensure our compliance with – the Dodd-Frank Act.

At ODU, we take our responsibility for due diligence along the supply chain very seriously and, in addition to our Code of Conduct, have defined the following expectations for responsible business conduct regarding the procurement of conflict minerals.

We handle the issue of “conflict minerals” carefully and ensure, as far as possible, that no material is procured from conflict countries that directly or indirectly finance or support armed groups (e.g., the Democratic Republic of Congo and neighboring countries such as the Central African Republic, Sudan, Rwanda, Burundi, Tanzania, and Zambia).

We expect our suppliers to implement appropriate measures to ensure that no components or products supplied to us originate from conflict or high-risk areas. In other words, they must not contain any conflict minerals whose sale benefits armed groups or perpetrators of human rights abuses.

This includes the stipulation that 3TG materials may only be sourced – directly or indirectly – from smelters listed on the RMI’s so-called „RMI Active and Conformant Facilities List”. These measures apply equally to our suppliers’ subcontractors. Upon request, our suppliers must provide the current revisions (as amended) of the Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT) developed by the RMI to ODU for review.

We encourage our suppliers to carry out proper due diligence and to expand these efforts across the supply chain to ensure compliance with the requirements set out in this guideline.

In our supplier questionnaire, we explicitly refer to and evaluate measures to ensure procurement of conflict-free raw materials and derive associated continuous improvement measures.