

To whom it may concern,

Paris, Thursday, January 23, 2020

RE: 2020-01-23 COUR 001/CPE

Subject: **Conflict Minerals Policy Statement**

Aubert & Duval and Erasteel are delivering parts and metallurgical products in various metals or alloys, such as special steels, super alloys, titanium and aluminum.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act requires due diligence and disclosure requirements on companies that manufacture products containing certain minerals designated as "Conflict Minerals" – cassiterite, columbite, tantalite, gold, wolframite, and their derivatives tin, tantalum and tungsten – sourced from certain Central Africa countries – Democratic Republic of Congo or surrounding countries.

These requirements are based on concerns that revenues obtained from the commercialization of these minerals may finance the ongoing conflict in the Democratic Republic of Congo.

Although this is a US law, it impacts our companies that belong to the ERAMET Group, regardless of where our suppliers might be located.

In accordance with the ERAMET Group Code of Ethics, Aubert & Duval and Erasteel undertake to prohibit the use of « conflict minerals » for all our products, and to get organized with suppliers to meet this requirement.

To ensure compliance with these requirements, our company requires that each supplier in its supply chain provide information regarding the conflict minerals that may be contained in the products purchased by our companies and so continue to source responsibly.

Moreover, having received the commitments from our tungsten direct suppliers we certify that the Tungsten (W) used to manufacture our products do not come from the conflict area of the Democratic Republic of Congo and that we don't use Tin (Sn), Tantalum (Ta) and Gold (Au).



Christophe PETIT
VP QUALITY

High Performance Alloys Division

To whom it may concern,

Paris, Thursday, January 23, 2020

RE: 2020-01-23 COUR 002/CPE

Subject: **Conformity of Aubert & Duval products to Conflict Minerals Act**

Aubert & Duval is delivering parts and metallurgical products in special steels and alloys.

Having received the commitments from our cobalt and tungsten primary suppliers, we certify that the Tungsten (W) and the Cobalt (Co) used to manufacture our products do not come from the conflict area of the Democratic Republic of Congo or adjoining countries.



Christophe PETIT
VP QUALITY

High Performance Alloys Division



To whom it may concern,

Paris, Thursday, January 23, 2020

Subject: **Conflict Minerals Compliance Statement**

The United States Security and Exchange Commission recently issued its final rules requiring corporations to report the use of “Conflict Minerals” in the manufacture of their products. The current law, generally referred to as the “Conflict Minerals Law”, was included as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

“Conflict Minerals” in this context refers to specific minerals originating from mines controlled by armed groups in the Democratic Republic of Congo or adjoining countries. The specific metals in question are:

Tin (Sn)	Metallic Tin or Cassiterite
Tantalum (Ta)	Metallic Tantalum, Tantalum Pentoxide
Tungsten (W)	Metallic Tungsten or Wolframite
Columbite Tantalite	(COLTAN)
Gold (Au)	

AUBERT & DUVAL is in full compliance with this legislation.

AUBERT & DUVAL has conducted a country of origin inquiry of its suppliers and determined that the minerals utilized by **AUBERT & DUVAL** that are necessary to the functionality or production of **AUBERT & DUVAL**'s products do not originate from these restricted countries.

Should you have additional questions, please contact your **AUBERT & DUVAL** sales support team.

Signature

Name: PETIT Christophe

Title: VP QUALITY **High Performance Alloys Division**

Company Name: **AUBERT & DUVAL**



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Conflict Minerals Reporting Template (CMRT)

English

Revision 5.12
 April 26, 2019

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	AUBERT & DUVAL
Declaration Scope or Class (*):	A. Company
Description of Scope:	Design, make and process high performance metallurgical solutions in the form of bars, powders, billets, forgings, closed die-forgings, hiped or pre-machined parts in steels, superalloys, aluminum and titanium alloys.
Company Unique ID:	VAT FR 73 380 342 808
Company Unique ID Authority:	French Government
Address:	10 Boulevard de Grenelle - CS 63205 - 75015 PARIS - FRANCE
Contact Name (*):	Mr. Christophe PETIT
Email - Contact (*):	christophe.petit@eramet.com
Phone - Contact (*):	+33 (0)1 45 38 38 88
Authorizer (*):	Mr. Christophe PETIT
Title - Authorizer:	VP QUALITY
Email - Authorizer (*):	christophe.petit@eramet.com
Phone - Authorizer (*):	+33 (0)1 45 38 38 88
Effective Date (*):	27-May-2019

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum	No	N/A
Tin	No	N/A
Gold	No	N/A
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	Supplied essentially as FeW by European Traders (Metherma, Nordmet, Scandinavian Steel AB and Speciality Metal Ressources)

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	No	We buy only Ferrotungstene

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	Our Suppliers recycle carbide muds and grinding scraps

5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	100%	Written Commitments from our four suppliers

6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	All suppliers have been identified and they guarantee the origin of their FeW supply



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Conflict Minerals Reporting Template (CMRT)

English

Revision 5.12
 April 26, 2019

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

7) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy? (*)	Yes	A Conflict Mineral Policy Statement signed by our CEO A&D on the 27-May-2019 and he forbides supply from CM area.
B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	Yes	www.asberdizvat.com
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Included in standard contract language
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	No	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Due diligence on our Supply Chain
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
H. Does your review process include corrective action management? (*)	No	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	French Nationality



Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*)	AUBERT & DUVAL	Complete	
Declaration Scope or Class (*)	A. Company	Complete	
Description of Goods	Design, make and process high performance metallurgical solutions in the form of bars, powders, pellets, forgings, closed die-forgings, hipcoed or precision machined parts in steels, superalloys, aluminum and titanium alloys.	Complete	
Contact Name (*)	Mr. Christophe PETIT	Complete	
Email - Contact (*)	christophe.petit@eramet.com	Complete	
Phone - Contact (*)	+33 (0)1 45 38 38 88	Complete	
Authorizer (*)	Mr. Christophe PETIT	Complete	
Email - Authorizer (*)	christophe.petit@eramet.com	Complete	
Phone - Authorizer (*)	+33 (0)1 45 38 38 88	Complete	
Effective Date (*)	27-May-2019	Complete	
1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)			
Tantalum	No	Complete	
Tin	No	Complete	
Gold	No	Complete	
Tungsten (*)	Yes	Complete	
2) Does any 3TG remain in the product(s)? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SIC term, see definitions tab) (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	No	Complete	
4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	0	Complete	
6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
7) Has all applicable smelter information received by your company been reported in this declaration? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
Question			
A. Have you established a conflict minerals sourcing policy? (*)	Yes	Complete	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field) (*)	Yes	Complete	
The URL in the comment field	www.aubertduval.com	Complete	
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Complete	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit organization? (*)	No	Complete	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Complete	
F. Does your company conduct Conflict Minerals surveys of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	Complete	
G. Do you receive due diligence information received from your suppliers against your company's expectations? (*)	Yes	Complete	
H. Does your review process include corrective action management? (*)	No	Complete	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	Complete	
Smelter List	In compliance with European Union	Complete	
Smelter List - Tantalum		Not Required	
Smelter List - Tin		Not Required	
Smelter List - Gold		Not Required	
Smelter List - Tungsten		Complete	
All rows with "Smelter not listed" selected, have a link to add relevant smelter		N/A	