

To whom it may concern,

Paris, Thursday, January 21, 2021

RE: 2021-01-21 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 21, 2021

RE: 2021-01-21 COUR 002/CPE

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

Madame, Monsieur

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 21, 2021

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**

Aubert & Duval, groupe Eramet - 10, boulevard de Grenelle – CS 63205 – 75015 Paris, France
T +33 (0)1 45 38 38 88
S.A.S au capital de 452 564 928 euros – B 380 342 808 RCS Paris – Code APE 741 J – TVA FR 73 380 342 808

www.eramet.com / www.aubertduval.com



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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.01
 May 19, 2020

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

[Link to Terms & Conditions](#)

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@acemet.com
Phone - Contact (*):	+33 (0)1 45 38 38 88
Authorizer (*):	Mr. Christophe PETIT
Title - Authorizer:	VP QUALITY
Email - Authorizer (*):	christophe.petit@acemet.com
Phone - Authorizer:	+33 (0)1 45 38 38 88
Effective Date (*):	27-Jan-2021

Answer the following questions 1 - 8 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	We buy only Ferrotungstene

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	Supplied essentially as FeW by European Traders (Metherma, Nordmet, Scandinavian Steel AB and Speciality Metal Resources)

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	No	

5) 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

6) 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

7) 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 6.01
 May 19, 2020

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

[Link to Terms & Conditions](#)

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

8) 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 responsible minerals sourcing policy? (*)	Yes	A Conflict Mineral Policy Statement signed by our A&D VP Quality on the 23-January-2020 and he forbides supply from 3TG area.
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	www.siberdiesel.com
C. 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	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	Due diligence on our Supply Chain
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g.,	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Included in standard contract language
G. Does your review process include corrective action management? (*)	No	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	French Nationality

To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red
[Click here to return to Declaration tab](#)

Required fields remaining to be completed

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Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*)	AUBERT & DUVAL	Complete	
Declaration Scope or Class (*)	A. Company	Complete	
Description of product	Design, make and process high performance metallurgical solutions in the form of bars, powders, billets, forgings, closed die-forgings, piped or pre-machined parts in steels, superalloys, aluminum and titanium alloys.	Complete	
Contact Name (*)	M. Christophe PEIT	Complete	
Email - Contact (*)	christophe.peit@eramet.com	Complete	
Phone - Contact (*)	+33 (0)1 45 38 38 88	Complete	
Authorizer (*)	M. Christophe PEIT	Complete	
Email - Authorizer (*)	christophe.peit@eramet.com	Complete	
Effective Date (*)	27-Jan-2021	Complete	
1) Does 100% (necessary mineral content in the product) or 95% (in the production process) (*)			
Tantalum	No	Complete	
Tin	No	Complete	
Cobalt	No	Complete	
Tungsten (*)	Yes	Complete	
2) Does any 3TG remain in the product(s)? (*)			
Tantalum		Complete	
Tin		Complete	
Cobalt		Complete	
Tungsten (*)	Yes	Complete	
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)			
Tantalum		Complete	
Tin		Complete	
Cobalt		Complete	
Tungsten (*)	No	Complete	
4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)			
Tantalum		Complete	
Tin		Complete	
Cobalt		Complete	
Tungsten (*)	No	Complete	
5) 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	
Cobalt		Complete	
Tungsten (*)	Yes	Complete	
6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)			
Tantalum		Complete	
Tin		Complete	
Cobalt		Complete	
Tungsten (*)	100.00%	Complete	
7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)			
Tantalum		Complete	
Tin		Complete	
Cobalt		Complete	
Tungsten (*)	Yes	Complete	
8) Has all applicable smelter information received by your company been reported in this declaration? (*)			
Tungsten (*)	Yes	Complete	
Question			
A. Have you established a responsible minerals sourcing policy? (*)	Yes	Complete	
B. Is your responsible minerals sourcing policy publicly posted on your website? (None = 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 source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	No	Complete	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	Complete	
E. Does your company conduct Conflict Minerals Survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	Complete	
F. Do you review due diligence information received from your suppliers against your company's specifications? (*)	Yes	Complete	
G. Does your review process include corrective action management? (*)	No	Complete	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	Complete	
Product List	No products or item numbers listed	Complete	
Smelter List - Tantalum		Complete	
Smelter List - Tin		Complete	
Smelter List - Cobalt		Complete	
Smelter List - Tungsten		Complete	
All fields with "Smelter not listed" selected, have a note and a red header		N/A	