



Conflict Minerals Policy

Our contribution

Schaeffler assumes its corporate responsibility and thereby creates the prerequisites for the sustained success of the company. In doing so, transparency is a decisive factor for trust and successful cooperation. Basis for this is the groupwide Code of Conduct and the Supplier Code. The Schaeffler Group has the aspiration to itself and its suppliers that all Schaeffler products are free of conflict minerals, sourced from entities, which directly or indirectly finance conflicts in the Democratic Republic of Congo, or surrounding countries and from mining operations in conflict-affected and high-risk areas.

According to the EU Regulation 2017/821 of 17 May 2017, this includes areas in a state of armed conflict or fragile postconflict as well as areas witnessing weak or non-existent governance and security. It also affects states that systematically violate international law, including human rights abuses. The term “conflict minerals” is defined as 3TG - gold, tantalum, tin, tungsten and any other mineral defined by regulations applicable to the sourcing of conflict minerals.

In addition, Schaeffler is guided by the worldwide requirements and guidelines regarding the sourcing of conflict minerals, along with the “Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains”, although Schaeffler is not directly affected by the US law Dodd Frank Act Section 1502.

While Schaeffler does not directly purchase those minerals from any source, it is aware of the possibility that conflict minerals may be part of the supply chain. In recognition of this, Schaeffler’s goal is to source these minerals responsibly by integrating the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas” in its group processes.

Expectation

In order to support Schaeffler and its customers to comply with the applicable rules and regulations for the sourcing of conflict minerals, Schaeffler expects its suppliers to fulfil their due diligence obligations along the supply chain with regard to conflict minerals and to submit reports, documentation or written assurances on request.

In detail it means following expectations towards suppliers:

- Comply with the [OECD Due Diligence Guidance](#) 5 step framework
- Report regarding the presence and source of minerals using the [RMI Conflict Minerals Reporting Template](#)
- Use smelters that have been declared conformant by the Responsible Minerals Initiatives (RMI) audit protocols or cross-recognized audit partner protocols. RMI conformant smelters list can be found [here](#).

Schaeffler proceeds a responsible pre-selection of suppliers. As a supplier selected to be relevant, Schaeffler insists to receive a reply about using conflict minerals, without any exemptions. A missing answer from the supplier side may lead to further measures or even to a renunciation of the future cooperation.

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