

Conflict Minerals Sourcing Policy

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act, which includes section 1502, a section which regulates disclosure of the use of any "Conflict Minerals". The term "Conflict Minerals" refers to minerals and other derivatives that are mined in the Democratic Republic of the Congo (DRC) and in adjoining countries, where the revenues may be used to directly or indirectly finance armed groups fighting in a civil war that causes major social and environmental injustices. The four minerals covered by the act are Gold (Au), Tantalum (Ta), Tin (Sn) and Tungsten (W) – collectively known as 3TG, all of which can be used in electronic components.

In June 2017 the European Commission adopted guidelines on the disclosure of environmental and social information which include a section on conflict minerals, regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

Roboception will take all reasonable efforts to refrain from using "Conflict Minerals" that support or finance armed organizations in the DRC or adjoining countries. Where possible, Roboception will incorporate the principles of responsible sourcing of Conflict Minerals into our contract terms with suppliers and will work with our suppliers to create awareness of these issues within our supply base. Roboception's suppliers are expected to determine the use, source and origin of conflict minerals and we ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from responsible mines and smelters.

With regards to the Dodd Frank Act Section 1502, we are not listed on any U.S. stock exchange so that we are not legally obliged to fulfill the SEC requirements published in August 2012 and to issue a conflict minerals report. With regards to the EU supply chain due diligence obligation outlined in regulation (EU) 2017/821, we are a downstream company operating beyond the metal stage and, therefore, have no obligation under the regulation. Nevertheless, as a part of the supply chain of listed companies and based on our corporate responsibility understanding, it is a matter of course to provide conflict mineral information to our customers.

Please do not hesitate to contact this e-mail address in case of questions: info@roboception.de



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