



RESPONSIBLE SOURCING OF CONFLICT MINERALS

Finder has seriously addressed the issue of minerals and metals from conflict zones – commonly referred to as “Conflict Minerals” * (gold, tin, tantalum, tungsten) and related extracts from mines in the eastern provinces of the Democratic Republic of Congo (DRC) and adjoining countries[§]. Similarly, Finder has also addressed issues affecting the social and environmental impacts linked to the extraction of cobalt, of which the DRC is the world’s largest producer.

The extraction of these minerals and metals is sometimes carried out using forced labour, and its proceeds can directly or indirectly finance military factions involved in civil war, leading to gross violations of human rights as well as social and environmental abuses.

Section 1502(e)(1) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of July 2010, and Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017[#] aim to promote the responsible sourcing of conflict minerals by American and European companies from those areas at high risk or in war zones, in order to hold sacrosanct both human rights and environmental heritage.

Finder uses these minerals and metals in some of its products and manufacturing processes: Gold is used in some of its contacts, tin and tin plating for connection systems and terminations, tantalum in condensers, and cobalt in belts and metal parts.

For a number of years Finder has implemented a policy of selection and controls regarding its suppliers and supplies. It has aligned itself with the commitments of the Conflict-Free Sourcing Initiative (CFSI), with the Global e-Sustainability Initiative (GeSI) and in conformance with the OCSE due diligence guidelines.

Finder can therefore guarantee, with a considerable degree of confidence, that, through direct contact with suppliers, and with an appropriate traceability system, its supply chain is completely ‘conflict free’. In addition to this, it keeps its Conflict Minerals Reporting Template (CMRT) and Cobalt Reporting Template (CRT) regularly updated.

* As defined in Section 1502(e)(1) of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

§ Defined as a country that shares an internationally recognized border with the Democratic Republic of Congo.

The obligations for companies, as set out by this Regulation with regard to conflict minerals, has been effective since 1st January 2021.