

We, the Feuerstein GmbH (Gustav-Krone-Str. 3; 14167 Berlin; Germany), hereafter called "Feuerstein", are committed to sourcing our raw materials responsibly. This Supply Chain Policy sets out our corporate commitments to ethical business practices and legal compliance.

As company, we strongly condemn and reject any support or favour of

- serious abuses, i.e.
 - torture, cruel, inhuman, and degrading treatment,
 - forced labour,
 - worst forms of child labour,
 - human rights violations and abuse, such as sexual violence,
 - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide),
- direct or indirect support to non-state armed groups,
- direct or indirect support to public or private security forces,
- bribery or fraudulent misrepresentation of the origin of minerals,
- money laundering,
- non-payment of taxes, fees, or royalties to governments

along the complete value chain.

For the so called conflict minerals, tungsten, tin, tantalum and gold, we only buy from smelters that are on the Responsible Minerals Assurance Process (RMAP) Conformant Smelter List (<https://www.responsiblemineralsinitiative.org>) and have implemented processes and procedures to ensure that our procurement does not support or favour any of the points listed above.

Our due diligence is set up in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (OECD Guidance: <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>).

In our purchasing procedure we have implemented a management system in accordance with the OECD Guidance to ensure all relevant raw materials are sourced in a manner that complies to this policy.

In accordance with Annex II of the OECD Guidance, we will reject any material that we believe has benefited or supported armed rebel/terrorist groups through illicit finance or other activities or involved serious human rights violations or any other points listed above related to the extraction, handling, transportation, or trade of minerals.

If, through our ongoing due diligence, market intelligence or publicly available whistleblower system, we determine that our suppliers are engaging in practices that do not meet our responsible sourcing requirements, we would immediately notify the supplier that we are suspending procurement from that supplier and develop a plan to mitigate the identified risks. The risk management strategy is either to

- i) continue trading as part of measurable risk mitigation efforts;
- ii) temporarily suspend trading while pursuing ongoing measurable risk mitigation; or

- iii) withdraw from the supplier after attempts to mitigate risk have failed or when a company deems risk mitigation unfeasible or unacceptable.

If the identified risks cannot be addressed to our satisfaction through the remedial actions, or if we identify further activities that indicate extreme abuse, dishonesty, or situations where a supplier is unwilling to assist us in our due diligence, we will immediately cease all activities with that supplier.

Results of the supply chain risk assessment are reported to Feuerstein's Managing Director.

We communicate this Supply Chain Policy to suppliers and make it publicly available for inspection. In addition, we require suppliers to contractually acknowledge our policies and agree to provide information, documentation, and arrangements for site visits as necessary to conduct our due diligence.

In accordance with OECD guidelines, we publish an annual "Conflict Minerals Due Diligence Report" on our website. This report will be published within the first quarter of the following year, in accordance with our SOP for due diligence.

For concerns related to Feuerstein's procurement and sourcing practices, everybody, including but not limited to employees, customers and suppliers, is encouraged to contact us using the following email address: conflictminerals@feuerstein-needles.de. Every incoming concern or request on this address will be directly forwarded to the responsible person and will be considered in our risk assessment.


Norbert Kluge
Managing Director