



Wainwright Instruments GmbH

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Conflict Minerals Policy Statement

The Conflict Minerals Disclosure Rule

The U.S. Securities and Exchange Commission (SEC) rule (the “Rule”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) requires publicly traded companies subject to the Securities Exchange Act of 1934 reporting requirements, to report annually on the use and source of ‘conflict minerals’ in their products. Conflict minerals are defined in the Rule as Gold as well as Tin, Tantalum and Tungsten (and their derivatives Cassiterite, Columbite-Tantalite and Wolframite), which originate in the Democratic Republic of Congo, or an adjoining country specified in the Rule (collectively the “Covered Countries”). The Rule was implemented to increase supply chain transparency with the aim of ending ongoing violent conflict in the Covered Countries that the U.S. Congress determined is being partially financed by revenues generated from the mining and transport of conflict minerals.

Our Commitment

Wainwright Instruments is committed to conducting its business worldwide with respect for human rights and in compliance with all applicable laws.

As part of this commitment, Wainwright Instruments acts responsibly in its sourcing and considers mining activities that fuel conflicts as unacceptable.

Wainwright Instruments will work closely with its suppliers and will seek, over time, to identify, reduce and ultimately eliminate the use in its products of conflict minerals that directly or indirectly finance or benefit armed groups.



Our Expectations

Wainwright Instruments expects its suppliers to comply with this Conflict Minerals Policy and the reporting requirements set forth in the SEC Conflict Minerals Reporting Rule.

Specifically, Wainwright Instruments expects its suppliers to:

- use raw materials, for which mining, transport, trading, manufacturing or export does not contribute to the financing of conflicts and human rights abuse,
- establish transparency and provide information about the origin of conflict minerals tin, tungsten, tantalum and gold included in their products, considering all upstream suppliers,
- work with their own upstream suppliers to establish transparency and provide information about the origin for any conflict minerals,
- complete and submit to Wainwright Instruments an annual Conflict Minerals Report (CMRT),
- cooperate with Wainwright Instruments for any due diligence to ensure origin/sourcing of conflict minerals,
- assist Wainwright Instruments to identify opportunities to source DRC conflict mineral-free materials.

Terence Wainwright
(Managing Director)

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