



CONFLICT MINERALS FREE SOURCING POLICY

It is the policy of the DIETER BRAUN GmbH and its affiliated companies (BRAUN) to comply with applicable laws and regulations. The Security and Exchange Commission, as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act, issued regulations requiring public companies to disclose whether gold, columbite-tantalite (tantalum), wolframite (tungsten) and cassiterite (tin) (referred to as the “3TG minerals”) contained in their products originated from mines in the Democratic Republic of Congo or adjoining countries financing conflict in the region.

The target of BRAUN is to use only conflict-free 3TG minerals in our products.

Our suppliers must be prepared to assure the 3TG minerals are conflict free. Suppliers can comply with this policy by sourcing 3TG minerals from outside the covered region or within the covered region from a smelter or mine determined to be conflict free.

In each case, the supplier must demonstrate compliance with this policy by exercising reasonable due diligence within its supply chain and flowing these requirements down to suppliers, and be prepared to provide evidence of the original source or smelter location of 3TG minerals. We expect suppliers to develop conflict minerals policies, due diligence frameworks and management systems consistent with the Organization for Economic Cooperation and Development (OECD) guidelines.

If a supplier does not comply with this policy, or if BRAUN determines a supplier is in violation of this policy or BRAUN’s Supplier Code of Conduct, BRAUN will work with the supplier toward compliance. If BRAUN determines compliance is unlikely within a specified time frame, BRAUN may transition to another supplier.

For more information for the Conflict Minerals Compliance and Conflict-Free Sourcing Initiative, see www.conflictreesmelter.org.