

Statement concerning the use of „conflict minerals“



On August 2012, the U.S. Securities and Exchange Commission adopted final rules to implement reporting and disclosure requirements related to „conflict minerals“, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) of 2010.

Companies registered on the U.S. stock exchange are required to report annually whether the products they manufacture or contract to manufacture contain conflict minerals that are necessary to the functionality or production of those products.

The intent of these regulations is to curtail the trade with conflict minerals, which originate from the Democratic Republic of the Congo (DRC) or surrounding countries and finance or benefit the ongoing violent conflict in the DRC or an adjoining country.

Conflict minerals within the meaning of the Dodd-Frank Act (status as of 01.01.2013) are:

- columbite-tantalite (coltan)
- cassiterite (tin)
- wolframite (tungsten)
- gold
- and their derivatives

VACUUBRAND INC. as a company is not subject to the mentioned reporting and disclosure requirements.

In light of the requirements of the Dodd-Frank Act, we will work with our suppliers to trace material content in our products in order to determine whether minerals originating from mining or noncertified smelting operations in the conflict region are used in our products. We will not knowingly use conflict minerals from noncertified smelters of the conflict region in our products. As a result, we will require our suppliers to trace material content in the products they supply to us down to a conflict free certified smelter and to provide to us documentation regarding their due diligence efforts. We will require our suppliers to procure components, parts, or products containing conflict minerals that have been identified to be conflict-free.

Due to the size of our supply chains as well as the complexity of the routes by which these conflict minerals are traded, smelted and sold it might require some time to obtain full traceability to exact origin.

Because of the given situation we ask for your understanding that we are not able to give specific answers to questionnaires or customers portals concerning conflict minerals.

Please feel to contact us should you have any further questions (regulatory@vacuubrand.net).

With kind regards,

VACUUBRAND INC.