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Introduction

Conflict minerals are minerals that originate from areas of armed conflict and human rights abuses, such as the Democratic Republic of Congo and its neighboring countries. These minerals include tin, tantalum, tungsten, and gold, which are used in various products such as electronics, jewelry, and automotive parts. The international community has enacted laws and regulations to prevent the trade of conflict minerals and to promote transparency and due diligence in the supply chains of companies that use these minerals.

GEA's Position and Compliance

GEA is a global engineering company that provides innovative solutions for various industries, such as chemical, beverage, energy, food, and pharmaceutical. GEA is committed to conducting its business in a responsible and ethical manner, and to respecting human rights and the environment. GEA is aware of the issue of conflict minerals and the potential risks and impacts associated with them. Read more in GEA's Conflict Minerals Policy: <https://www.gea.com/en/company/suppliers/conflict-minerals-policy/>

GEA is not obliged to report conflict minerals according to the Dodd-Frank Act, as GEA does not report to the U.S. Securities and Exchange Commission (SEC). The Dodd-Frank Act requires certain publicly traded companies to disclose their use of conflict minerals and their due diligence measures to ensure that their minerals do not directly or indirectly finance, or benefit armed groups in the conflict-affected regions.

GEA is also not obliged to report conflict minerals according to the EU Conflict Minerals Regulation (2017/821), as the imported volume of minerals is well below the minimum threshold. The EU Regulation requires importers of minerals and metals to conduct due diligence and report on their sourcing practices to ensure that they do not contribute to conflict or human rights violations.

However, GEA follows the Guidance from the Organization for Economic Cooperation and Development (OECD) on this matter to present transparency in GEA's supply chain. The OECD Due Diligence Guidance for Responsible Minerals Supply Chains supports the legislations mentioned earlier and provides a framework for companies to identify and mitigate the risks of conflict minerals in their supply chains. The OECD Guidance consists of five steps: establish strong company management systems, identify, and assess risks in the supply chain, design and implement a strategy to respond to risks, carry out independent third-party audits, and report on supply chain due diligence.

GEA's Reporting Process and Practices

GEA has implemented a process to collect and consolidate information on the use and origin of conflict minerals in its products and suppliers. GEA uses the Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI) to gather data from its suppliers. The CMRT is a standardized tool that facilitates the exchange of information on conflict minerals across the supply chain. GEA analyzes the data and prepares a consolidated CMRT report that covers its entire product portfolio.

GEA does not share its consolidated CMRT report publicly, as it considers it to be confidential and proprietary information. However, if GEA is obliged to share this information in the terms of a specific contract with a customer, we will share our consolidated CMRT report upon request. If that is the case, please share a copy of the contract, and inform where our obligation is stated to report conflict minerals.

Conclusion

GEA is committed to being a responsible and ethical company that respects human rights and the environment. GEA is aware of the issue of conflict minerals and the potential risks and impacts associated with them. GEA is not legally required to report on conflict minerals, but it follows the OECD Guidance to conduct due diligence and ensure transparency in its supply chain. GEA collects and consolidates information on conflict minerals using the CMRT and prepares a report that covers its entire product portfolio. GEA does not share its report publicly, but it will share it with customers who have a contractual obligation to receive it.

For more information, please contact compliant-minerals@gea.com