
Information and statement about EU Directive 2017/821 and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) relating to conflict minerals of Otto Roth GmbH & Co KG

Dear Sir/Madam,

On 19 May 2017 the Official Journal of the European Union published Directive (EU) 2017/821 specifying the obligations of EU importers to comply with the duty of care within the supply chain of certain minerals and metals originating from conflict and high-risk regions. As per Article 20 Section 2 of the EU Directive the main part of the specifications came into force as of 9 July 2017.

From 1 January 2021 these obligations also apply to EU importers relating to the duty of care within the supply chain, specified in Articles 3 Sections 1 and 2, 4 to 7 of the Directive. These are essentially obligations relating to the management system, risk management obligations, mandatory auditing by third-parties and disclosure requirements.

These two directives particularly focus on tin, tantalum, tungsten, columbite (tantalite), gold and these substances' derivatives, mined in conflict regions, such as the Democratic Republic of Congo, Rwanda, Burundi, Central African Republic, Sudan, Tanzania, Republic of Congo (not the same as the Dem. Rep. Congo), Uganda and Zambia. Amongst others, the associated directives have the objective to restrict or prevent trade with these minerals from listed conflict regions.

Otto Roth does not directly import conflict minerals. We are currently unaware of any indications that our products contain minerals originating from conflict or high-risk regions.

The only substance listed above that is contained in certain products made by Otto Roth is the mineral tin. The material is essentially contained in the finish layer. Our suppliers procure this raw material in Europe and Asia.

Otto Roth GmbH & Co KG

A handwritten signature in blue ink that reads 'Crisafulli Giovanni'.

p.p. Giovanni Crisafulli
Head of Quality Assurance

Stuttgart, 16/07/2019