

Strategy for sourcing of conflict minerals

We have stringent rules and a zero-tolerance policy when it comes to corporate governance

In accordance with the shared ethical values and principles expressed in our Code of Conduct, Atotech adheres to the responsible sourcing of precious and non-precious metal salts in our operations and supply chains, in compliance with all applicable laws and regulations.

In applying these principles, we pay increased attention to the fact that so-called “conflict minerals” (i.e. wolframite, cassiterite, columbitetantalite (coltan), gold and their derivative metals tantalum, tin and tungsten) originating from the Democratic Republic of Congo may finance violence there or in adjoining countries. We are committed to only using such minerals which are conflict free and which do not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo (DRC) or adjoining countries, as defined and required by the US Securities and Exchange Commission (SEC) rules and the US Dodd-Frank Act Section 1502.

We expect our suppliers to have policies and due diligence measures in place which will enable us to reasonably ensure that raw materials and components supplied to us containing conflict minerals are “DRC conflict free”. We evaluate our supply chain related to conflict minerals by using the Conflict Minerals Reporting Template developed by the Conflict-Free Sourcing Initiative (CFSI) as a means of identifying the mineral’s country of origin as well as the smelters and refiners being utilized. We support our customers by providing the due diligence information necessary to confirm that the raw materials contained in our products are conflict free.



Geoff Wild
CEO of Atotech

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