



Conflict Minerals Policy

(Tin, Tantalum, Tungsten and Gold – 3TG)

1. Introduction

Burat & Klein Datentechnik GmbH is committed to conducting its business in an ethical and socially responsible manner. As a manufacturer and assembler of electronic products, we recognize that certain materials used in electronic components may contain tin, tantalum, tungsten, or gold (“3TG”), which are subject to international conflict minerals regulations.

We support efforts to prevent the use of minerals that directly or indirectly finance armed groups in conflict-affected and high-risk areas (CAHRAs), including the Democratic Republic of the Congo (DRC) and adjoining countries.

2. Scope of Activities

Burat & Klein:

- Purchases electronic components, printed circuit boards (PCBs), and related materials from established distributors and suppliers.
- Performs assembly and soldering of electronic components.
- Does not purchase raw minerals directly from mines or smelters.
- Does not have direct relationships with smelters or refiners.

3. Supplier Expectations

We expect our direct suppliers to:

- Comply with applicable conflict minerals laws and regulations.
- Implement appropriate due diligence processes within their own supply chains.
- Provide relevant conflict minerals information upon request (e.g., CMRT or equivalent declarations).
- Source materials from responsible and, where possible, audited smelters and refiners.

4. Due Diligence Approach

As a small and medium-sized enterprise, our due diligence is risk-based and proportionate to our position in the supply chain.

Our approach includes:

- Sourcing components primarily from reputable and internationally recognized distributors.
- Requesting conflict minerals information from suppliers where required by customers or regulations.
- Reviewing available supplier declarations and industry-standard reporting templates (e.g., CMRT).
- Maintaining internal responsibility for conflict minerals compliance.

Due to our position in the supply chain, we generally do not have direct visibility to the smelter or mine level.

5. Responsibility

Overall responsibility for the implementation of this policy lies with the management of Burat & Klein.

Conflict minerals inquiries from customers are reviewed and coordinated internally.

6. Continuous Improvement

We are committed to continuously improving transparency in our supply chain in a manner that is appropriate to our size, structure, and role in the electronics supply chain.

Flora Winkler, General Management