

To whom it may concern

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### **Kugler GmbH Statement on the non-use of Conflict Minerals**

Dear Business Partner,

Kugler GmbH is committed to promoting honest and ethical business conduct by all its employees and compliance with the laws that govern the conduct of business worldwide.

Kugler GmbH believes that a commitment to honesty, ethical conduct and integrity is an essential asset that builds trust with clients and business partners and the community in which we are operating.

In July of 2010, the United States Congress passed legislation requiring those companies that are subject to Securities and Exchange Commission (SEC) reporting requirements to include information in their SEC reports regarding the use of "Conflict Minerals" in the manufacture of their products. "Conflict Minerals" in this context refers to specific minerals originating from mines controlled by armed groups in the Democratic Republic of Congo (DRC) or adjoining countries.

The details of the "conflict minerals" legislation can be found in Section 1502 of HR 4173, signed into law on July 21, 2010 and in SEC rulemaking which can be found at the following link:

<http://www.gpo.gov/fdsys/pkg/FR-2012-09-12/pdf/2012-21153.pdf>.

Whilst Kugler GmbH is not an SEC reporting company, we see it as our responsibility to take this legislation into consideration with the aim to enable designation of all materials used for our products as "DRC conflict free". At this time, Kugler GmbH is not aware of the use of any Conflict Minerals in its direct supply chain and sources no minerals from DRC. Kugler GmbH is committed to ensure sustainable sourcing of all raw materials in its supply chain.

Please feel free to contact the author of this letter with any further concerns or questions on any related matters.

Joerg Kugler  
CEO



Christoph Nuding  
Environment Management Representative

