

## **Response to Request for Information – Conflict Minerals**

Dear Sirs, Dear Madams,

This letter is in response to your request for information as to whether our products contain “conflict minerals,” which the U.S. Securities and Exchange Commission (“SEC”) has defined as gold, columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives (tin, tantalum, or tungsten).

SEC Conflict Minerals Rule, 77 Fed. Reg. 56274 (Sept. 12, 2012).

Due to the wide variety of requests we receive, TYROLIT Schleifmittelwerke Swarovski K.G., provides letters such as this in response to requests for regulatory information.

On behalf of TYROLIT Schleifmittelwerke Swarovski K.G., the following information applies to all our products:

The SEC excluded conflict minerals in physical tools, machines and indirect equipment a manufacturer uses to produce a product from that manufacturer’s requirements to report under the conflict minerals rule:

We do not believe that a conflict mineral in a tool or machine is captured by the Conflict Minerals Statutory Provision because, although the conflict mineral may be included in the tool or machine, it is the tool or machine and not the conflict mineral that is necessary to the production. Additionally, the tool or machine is unlikely to be contained in the final product.

Like tools and machines, indirect equipment used to produce a product, such as computers and power lines, does not bring the product that is produced with the equipment into the ‘necessary to production’ language.

77 Fed. Reg. 56273. 56297-98 (Sept. 12, 2012)

For these reasons, when you purchase a product and use it as a tool, machine or indirect equipment in your production process, you are not required to include such products in your determination of your manufactured product’s necessary conflict minerals. The relevant TYROLIT Schleifmittelwerke Swarovski K.G. products that would come under this exclusion, when used as intended as tools, machines or indirect equipment in your production process, would include (but are not limited to):

- Abrasives and grinding wheels

TYROLIT Schleifmittelwerke Swarovski K.G. is supplying this information on the condition that the persons receiving it will make their own determination as to its suitability for their purposes prior to use. Customers are encouraged to consult with legal and regulatory experts to determine applicable regulations in light of intended use of the product.

I trust the above information is responsive to your request.

Please contact me, if there are any further questions.

Sincerely,

A handwritten signature in blue ink that reads "Antje Schwemberger". The signature is written in a cursive style.

Antje Schwemberger

[antje.schwemberger@tyrolit.com](mailto:antje.schwemberger@tyrolit.com)

Environmental Manager

TYROLIT Group