



LOMGroup's Conflict Minerals Policy

Introduction

Sustainability in its three dimensions (environmental, social, and economic) is of the highest importance for LOMGroup. Sustainable conduct forms the basis of our business decisions and dealings with our stakeholders.

Along with governments, NGOs, the investment community, and many other companies worldwide, we are concerned about human rights violations including forced labor, human trafficking and child labor occurring anywhere in the world, as well as the role that armed conflicts play in causing extreme violence across the African Sphere.

In 2010, the U.S. Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"), pursuant to which the U.S. Securities and Exchange Commission (the "SEC") issued rules requiring certain reporting companies to make disclosures under specific circumstances concerning the use of Conflict Minerals. The term "Conflict Mineral" is defined as cassiterite, columbite-tantalite, gold, wolframite, or their derivatives to be financing conflict in the DRC region.

LOMGroup is not listed on any U.S. stock exchange and thus not under an obligation to respond to the SEC requirements published in August 2012 and to issue a Conflict Minerals Report. Nevertheless, LOMGroup continues to exercise its duty of care within the supply chain. Siemens, like many other companies, is aware of the difficult situation that products and components purchased from suppliers may contain minerals originating from conflict-affected countries.

Our role in the supply chain

In order to ensure sustainability in our supply chain, we have established the "Code of Conduct for Siemens Suppliers." We contractually commit our suppliers to the "Code of Conduct for Siemens Suppliers" and, in turn, expect them to promote these standards to their own suppliers.

We have rolled out a uniform and enterprise-wide process to determine the use, source and origin of Conflict Minerals in our supply chain. We work closely with our direct suppliers to support us in carrying out these steps. Where necessary, we work with suppliers in order to remediate risks and perform additional due diligence so that we can continue to source responsibly, building on established management processes.



Commitment

We are committed to working toward avoiding the use, within our supply chain, of Conflict Minerals.

Because of our support for human rights and our concern that funds from purchases of materials used in our supply chain may be exploited for illegal purposes, we are taking systematic steps to understand whether any cassiterite, columbite-tantalite, gold, wolframite, or their derivatives in our products are financing the conflict and violence in the DRC region.

LOMGroup actively supported and plans to further support the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" as a pilot-member for the development of the respective Due Diligence processes which expressly recognizes a Risk-Based Due Diligence in the Mineral Supply Chain as well as industry-wide initiatives like the "Conflict-Free Sourcing Initiative".

We do not encourage implementing a de facto embargo on the DRC and adjoining countries in the sourcing of the respective minerals. This is in line with our requirement to comply with the principles of non discrimination with regard to supplier selection and treatment and follows the call of many internationally active human rights organizations.

LOMGroup