



Conflict Minerals Sourcing Policy of L A P GmbH Laser Applikationen

As a leading global company dedicated to producing high-value laser technology for our customers, LAP GmbH Laser Applikationen (LAP) is aware of concerns that conflict minerals¹⁾ mined in conflict-affected and high-risk areas (CAHRAs)²⁾ may be making their way into the electronic industry supply chain and may be in conflict with human rights and environmental protection.

LAP is committed to ethical and sustainable sourcing and supports the use of “conflict-free minerals” in its products. Our goal is to refrain from purchasing and using conflict minerals from CAHRAs for our products, except for those materials that are certified as “conflict free”.


LAP does not source minerals directly from miners, smelters or local exporters in CAHRAs. Nevertheless, it is important for us that our suppliers only source, process, and supply conflict free minerals and that LAP does not contribute to (i) serious abuses of human rights associated with the extraction, transport or trade of minerals, (ii) direct or indirect support to non-state armed groups (iii) support to public or private security forces that illegally profit from the mineral sourcing and trading of minerals, (iv) bribes to conceal or disguise the origin of minerals, (iv) money laundering or (v) tax evasion in connection with the sourcing of trading of minerals.

Where we identify that suppliers use minerals from sources participating, tolerating, contributing or supporting any of the aforementioned abuses, we will consider suspending or discontinuing the business relationships with the respective suppliers, if no other solution can be found.


In accordance with our general sustainable approach, we are taking measures in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to ensure that the products do not contain any conflict mineral.

- LAP proactively undertakes due diligence and continuous monitoring of the supply chain to avoid direct or indirect procurement of conflict minerals.
 - LAP requires existing suppliers to confirm and certify that they do not use conflict minerals.
 - LAP requires its suppliers to comply with the same principles as set out in this Conflict Minerals Sourcing Policy.
 - If a supplier becomes aware of the use of conflict minerals in any goods supplied to LAP, it is contractually obliged to immediately inform LAP. Such notification shall include any tracking information to specify which goods may contain these minerals.
 - LAP will qualify new electronic suppliers to increase transparency of potentially conflict minerals.
- LAP does not offer, promise, give or demand bribes and will resist the solicitation of bribes to conceal or disguise the origin of minerals.
- LAP offers a whistleblower system and encourages all employees and business partners to report any infringement of this policy and any concerns regarding the use of conflict minerals (hinweisgeber@esche.de).
- With the perspective of upcoming European laws LAP confirms to comply with those regulations.

Lüneburg, 27.09.2023

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Martin Pabst, Head of Purchasing

¹⁾ The Term conflict minerals refer to tantalum, tin, tungsten, and gold from mines and smelters that have directly or indirectly contributed to armed conflict or human rights abuses in conflict-affected and high-risk areas, including the Democratic Republic of Congo (DRC) and adjoining countries.

²⁾CAHRAs are areas with the presence of armed conflict, widespread violence or other risks to harm people (CAHRAs (cahraslist.net)).