

Elettronica Conduuttori policy statement on Conflict Minerals

Current as of February 03, 2021

As a socially responsible company, Elettronica Conduuttori has concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights, comply with laws and regulations, and follow a Code of Conduct.

Elettronica Conduuttori supports the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC) and nine adjoining countries:

Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda).

It has been widely reported that the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum and gold, now referred to as “conflict minerals.” Armed groups fight for control of mines in this region and use forced labor to mine and sell the minerals, which in turn funds ongoing violence.

Background

In August 2012, the United States Securities and Exchange Commission (“SEC”) issued its final rules regarding “Conflict Minerals” (known as ‘3TG’ – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the Act.

Expectations for Suppliers

In support of Elettronica Conduuttori policy on conflict minerals, suppliers must supply materials to Elettronica Conduuttori that are “DRC Conflict-Free”. DRC includes the countries of Democratic Republic of Congo, Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda.

Suppliers must adopt policies and management systems with respect to conflict minerals and must require their suppliers to adopt similar policies and systems. Elettronica Conduuttori expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

In the event Elettronica Conduuttori determines that a supplier’s efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Elettronica Conduuttori reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Under the definition of “DRC Conflict-Free,” products supplied to Elettronica Conduttori:

1. Do not contain tantalum, tin, tungsten or gold (3TG) as elements necessary to their production or functionality, or,

2. If products supplied to Elettronica Conduttori do contain these minerals, the minerals must originate outside the DRC, come from scrap or recycled sources, or from smelters that have been validated by an independent private sector party to be conflict-free.

Certified conflict-free smelters are compliant to the EICC (Electronic Industry Citizenship Coalition) conflict free smelter (CFS) protocol using the CFS Compliant Smelter List. Through the CFS protocol, smelters are audited globally; the list of compliant smelters and refiners is posted at www.conflictreesmelter.org.

Elettronica Conduttori will survey direct suppliers as a part of our conflict minerals due diligence program.

Suppliers should respond in to survey requests in a timely manner, and with full disclosure following the specific instructions provided.