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# **CONFLICT MINERALS POLICY**

**Ilpea Group**

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## 1. INTRODUCTION

This Conflict Minerals Policy (hereinafter also the "Policy") is developed by Ilpea Group (hereinafter also "Ilpea", or the "Group", or the "Company") and is implemented throughout the Group, including its more than 30 plants in 5 continents all over the world.

### **1.1 Ilpea's commitment and Policy Purpose**

Conflict minerals are minerals, such as tin, tantalum, tungsten and gold (also known as "3TG"), from areas affected by conflicts or at high risk of conflicts, such as the Democratic Republic of Congo (DRC) and neighbouring countries, where mining and commercialization can directly or indirectly finance armed groups or contribute to human rights' violations.

In this regard, this Conflict Minerals Policy defines the principles that Ilpea undertakes to guarantee in order to obtain a responsible and sustainable supply chain.

This Policy defines:

- principles and processes put in place to assess and mitigate the risks associated with "conflict minerals" and to prevent human rights' abuses;
- responsible procurement practices put in place in order to ensure that all materials used are "conflict-free".

### **1.2 International Reference Framework**

This Conflict Minerals Policy and related principles support the main international standards, laws and guidelines listed below:

- Section 1502 of the US Dodd Frank Act Wall Street Reform and Consumer Protection Act
- Regulation (EU) 2017/821 on minerals from conflict-affected or high-risk areas (including related economic sanctions for human rights abuses
- The OECD "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas"

Ilpea's commitment to responsible sourcing and greater transparency on the origin of the so-called "3TG" minerals is implemented by joining the Responsible Minerals Initiative and by filling in the Conflict Minerals Reporting Template (CMRT).

### **1.3 Internal Reference Framework**

In order to ensure consistency and uniformity, Ilpea's Conflict Minerals Policy integrates the information set out in the Group's other operating policies and procedures:

- Code of Ethics;
- Supplier Code of Conduct;
- Human Rights Policy;
- Whistleblowing Procedure;
- Anti-Bribery Policy;
- Quality, Health, Safety, Environment and Sustainability Policy;
- Privacy Policy.

### **1.4 Scope of application and recipients**

This Conflict Minerals Policy is addressed to all suppliers, subcontractors and business partners who are required to ensure that procurement of materials in products, parts or components supplied to Ilpea complies with the principles set out in this Policy.

## **2. GOVERNANCE**

Supervision of this Policy is headed by Research and Development (R&D) at Corporate level, which ensures that the Policy and its Principles are periodically reviewed and, if necessary, updated, and it also guarantees its correct application.

R&D Function, at Corporate level, also takes care of the dissemination of this Policy in all different operational sites, while accountable Managers of each operational site ensure its implementation at local level.

## **3. COMMUNICATION AND IMPLEMENTATION**

The Conflict Minerals Policy is communicated to all Ilpea suppliers

The Group expects all suppliers to respect this Policy in order to attain responsible and "conflict free" procurement.

The Policy is always available to all stakeholders on Group's website at [www.ilpea.com](http://www.ilpea.com).

The Policy is periodically reviewed to ensure its consistency, adequacy and compliance with applicable regulatory requirements and effective implementation.

With a view to transparency and greater commitment to increasingly responsible sourcing, Ilpea undertakes to report on its performance in the "conflict minerals" area, to identify potential risks and non-conformities and to apply appropriate remedial actions.

## **4. RISK ASSESSMENT AND MITIGATION**

Ilpea carries out ESG risk assessments related to its business activity, as an integral part of its sustainability strategy.

This risk assessment includes a specific assessment of "conflict minerals" risks related to its production and is carried out through direct engagement of local managers.

Ilpea is committed to adopting the necessary measures available, including the aforementioned risk assessment, in order to proactively monitor the entire supply chain and define remedial actions based on severity and impact of any violations.

If Ilpea becomes aware of violations of one or more Principles included in this Policy, it undertakes to implement corrective actions depending on the magnitude and impact of the violation found.

## **5. WHISTLEBLOWING**

The objective of the procedure is in fact to ensure that anyone feels supported in speaking in confidence and in reporting any matters that may involve something improper, unethical or inappropriate and to handle all reports promptly, consistently, professionally and completely anonymously.

All reports will be taken seriously, treated as confidential and handled without fear of retaliation.

As soon as you become aware of any wrongdoing or suspected wrongdoing, you are recommended to report the situation by clicking on the link [ilpea.report.com](https://ilpea.report.com) (the "Tool"), through which reports may be made by name or anonymously if you wish. The Supervisory Body, composed of impartial professionals properly appointed by the Board of Directors, will take care of the suspected wrongdoing.