



Under the **Dodd-Frank Wall Street Reform Act** of July 2010, the United States has passed legislation that intends to regulate the use of minerals from Countries affected by conflicts or from extensive human rights violations, such as the **Democratic Republic of the Congo and neighboring Countries** (Rwanda, Burundi, Angola, Central African Republic, Sudan, Tanzania, Uganda and Zambia). This is in particular of Section 1502 of the law, for the application of which the Securities and Exchange Commission (SEC) published the "Final Rule" 22nd August 2012, **which came into force on January 1, 2013.**

The law does not prohibit the use of non-conflict-free minerals, that is coming from conflict zones, but it obliges American companies, that they operate on American territory or which export to the USA, to inform the consumer about the origin of the minerals and to put it in such a way as to be able to choose the products of which companies to buy. To do this, companies have an obligation to trace the origin of some metals, in particular **Tin, Tungsten, Tantalum and Gold** (3TG) used in their products.

The European Union has also issued a specific Regulation (EU) 2017/821 which "establishes obligations regarding due diligence in the supply chain for Union importers of Tin, Tantalum and Tungsten, their minerals, and Gold, originating in conflict-affected or high-risk areas", entered into force on 1 January 2021 for importers only, based in the EU, of Tin, Tantalum, Tungsten and Gold, whether in the form of raw ores, concentrates or metals worked

The regulation requires EU companies operating in the supply chain to ensure that the minerals and metals affected by the regulation are only imported from responsible sources.

With this in mind, F.lli Giacomello srl declares not to buy, knowingly, 3TG minerals from the Conflict Region unless they come from mines or foundries certified as "conflict free".

In order to ensure compliance with the Dodd-Frank Act and the EU Regulation 2017/821, we ask our suppliers to undertake an adequate verification of their supply chains to determine if 3TG minerals come from:

- mines and foundries outside the Conflict Region or
- mines and foundries certified by an independent third party as "conflict free", if located within the Conflict Region.

The Supplier Code of Conduct and the Terms and Conditions of Purchase of F.lli Giacomello srl require suppliers to perform an adequate verification and the submission of written documentation attesting the provenance of materials containing 3TG minerals used in the production of products from areas located outside the Conflict Region or, if coming from the Conflict Region, that the mines and foundries are certified by an independent third party as "conflict free".