



CONFLICT MINERALS POLICY

Guidizzolo, September 2018

The United States Securities and Exchange Commission (SEC) has prepared the “Conflict Mineral Rules” for the “Conflict Minerals” (gold, tin, tantalum and tungsten), as indicated by the Dodd-Frank Wall Street Reform and Consumer Protection Act.

The purpose of the “Conflict Minerals Rules” is to discourage the use of “**Conflict Minerals**” coming from or extracted from the geographical area defined as “**Conflict Region**”, which includes the Democratic Republic of Congo and neighboring countries, whose trade could be used to finance armed groups and consequent violent conflicts in Central Africa.

Elettronica FM (EFM) is constantly committed to working in a socially responsible way and therefore supports this initiative by adopting a policy to discourage the purchase of “**Conflict Minerals**” from the “**Conflict Region**”. In particular, EFM is committed to:

- do not consciously procure “**Conflict Minerals**” from the “**Conflict Region**” that are not certified as “**Conflict Free**”;
- ensure compliance with these requirements and require their suppliers to undertake an appropriate evaluation process with their supply chains, so that the specified metals only come from:
 - mines and smelters outside the “**Conflict Region**”;
 - mines and smelters within the “**Conflict Region**” that have been certified as “**Conflict Free**” by an independent third party.

The goal is to guarantee that only “**Conflict Free**” minerals are used in materials, parts and components purchased and used by EFM.

EFM has obtained, or is about to obtain, information from its suppliers regarding the origin of gold, tin, tantalum and tungsten contained in the material used by EFM in its production processes.

If EFM detects the use of minerals extracted or processed in structures considered “**NON-Conflict Free**” in any purchased material, part or component, EFM will take appropriate action to make the product “**Conflict Free**”.

General Direction
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