



# Conflict Minerals and Cobalt POLICY

## Conflict Minerals

On August 22, 2012, the United States Securities and Exchange Commission (SEC) announces the adoption of the definitive rules relating to "conflict minerals" referred to in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Conflict Minerals Rules").

The aim of the Conflict Minerals Rules is to discourage the use of minerals whose trade could finance violent conflicts in Central Africa.

Conflict minerals include gold, columbite-tantalite (coltan), cassiterite, wolframite and their derivatives, currently limited to tantalum, tin and tungsten, regardless of their origin.

The "conflict minerals" that can have negative consequences under the Conflict Minerals Rules are minerals that come (or are extracted) from the Democratic Republic of Congo (DRC) and/or neighboring countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia) ("DRC Conflict Minerals").

## Cobalt

Cobalt is used in lithium-ion batteries, and more than 70% of the world's cobalt comes from the Democratic Republic of the Congo (DRC).

Although cobalt is not listed as a "conflict mineral" in the Dodd-Frank Act or in the European Regulation on Conflict Minerals, its extraction puts many Congolese communities at risk.

In fact, various problems of social and environmental impact on the extraction of cobalt made by the most "artisanal" mines were highlighted, including child labor and unsafe working conditions.

The A. Benevenuta & C. Spa Management is constantly committed to operating in a socially responsible manner.

This is the policy that was adopted to discourage the purchase of "DRC Conflict Minerals" and to encourage the use of "ethical" cobalt, that is, from certified mines.

The global supply chain for these minerals, however, is complex, and tracing the minerals in our products from their origin is a complicated challenge.

While not purchasing minerals directly from mines and foundries, however, A. Benevenuta & C. Spa has undertaken a process of awareness and collaboration with its suppliers to ensure the non-use of "conflict minerals" and cobalt, as required. the same commitment on the part of its Suppliers.

Management A. Benevenuta & C. Spa has formulated, documented and disseminated its Policy in relation to "conflict minerals" and cobalt, making sure that it is understood, implemented and maintained at all levels of the Organization.

The Policy in relation to "conflict minerals" and cobalt is reviewed and, if necessary, updated on the occasion of the Management Review.

A. Benevenuta & C. Spa - General Manager

13/07/2021

Date	Change	Description	Revision
29/07/2019	Emission		1
13/07/2021	Upgrade	Cobalt section	2