



<b>Zoppas Industries</b> 	<b>E. M. S. PROCEDURE</b>	E.POLICY 003
	<b>POLICY FOR THE MANAGEMENT OF "CONFLICT MINERALS"</b>	Rev.: 1
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PROCEDURE REVISIONS

REV.	ISSUE DATE	FILLED IN BY	VARIATION AND/OR MODIFICATION	VERIFIED BY	APPROVED BY
0	26.08.2015	N. PONGILUPPI		A. CLEMENTE	G. SONEGO
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Hereby, IRCA S.p.A. formalizes the purchase policy regarding metals extracted from minerals of the Democratic Republic of Congo and/or of bordering countries (Conflict Region) whose revenues finance the local inter-ethnic conflicts (“Conflict Minerals”), according to the American Law H.R. 4173 July 2010 (“Dodd-Frank act”).

In order to guarantee that the products purchased by the Suppliers and subsequently sold to the Customers are produced only with “Conflict free” materials and components, IRCA S.p.A. undertakes:

a) not to employ “conflict minerals”:

- Columbite/Tantalite (minerals used to extract Tantalum)
- Cassiterite (mineral used to extract Tin)
- Wolframite (mineral used to extract Tungsten)
- Gold

from mines of the “Conflict Region” and not certified as “Conflict Free”;

b) to implement the necessary actions towards its own supply chain identify the origin of said “conflict minerals”;

c) to require its suppliers to certify, through an independent third-part authority, that its own supply chain ensures "conflict minerals" originating only from:

- mines and foundries outside the “Conflict Region”;
- mines and foundries certified as “conflict-free” by a third independent authority, if they are located within the “Conflict Region”;

d) to guarantee the distribution of this document by publishing it on its website ([www.zoppasindustries.com](http://www.zoppasindustries.com))

The Management of IRCA S.p.A.