
	E. M. S. PROCEDURE	E.POLICY 003
	POLICY FOR RESPONSIBLE SUPPLY OF “CONFLICT MINERALS”	Rev: 2
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PROCEDURE REVISIONS

REV.	ISSUE DATE	FILLED IN BY	VARIATION AND/OR MODIFICATION	APPROVED BY
0	26.08.2015	A.CLEMENTE		G. SONEGO
2	03.06.2021	A. LAVINA	Translation of the Italian version rev. 2 – General review	M. CELOT

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I.R.C.A. S.p.A. formalizes its own commitment not to contribute to the negative effects that may derive from the extraction, transformation and trade of minerals from conflict-afflicted or high-risk areas. Such negative effects cover the following themes: serious abuses associated with the extraction, transport or trade of minerals, direct or indirect support to non-state armed groups, direct or indirect support to public or private security forces, bribery and fraudulent misrepresentation of the origin of minerals, money laundering, payment of taxes, fees and royalties due to governments. Therefore, I.R.C.A. S.p.A. supply policy relating to the conflict minerals refers to what foreseen by the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 and by the Regulation (EU) 2017/821 even where I.R.C.A. S.p.A. does not consider to be directly involved by the aforementioned regulations (duty holder).

In this context, conflict minerals mean:

- Tantalum, its compounds and minerals
- Tin, its compounds and minerals
- Tungsten, its compounds and minerals
- Gold and its compounds

With the purpose to ensure that its supply chain regarding conflict minerals is safe, transparent and verifiable, I.R.C.A. S.p.A. commits to apply the principles illustrated in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, in particular:

- a) by adopting procedures integrated in its own company management system;
- b) by requiring its own Suppliers to adhere to the same principles of due diligence;
- c) by identifying the risks through its supply chain mapping allowing to trace the conflict minerals origin and in particular the origin of the smelters certified by an independent third-party audit;
- d) by starting a reactive dialog with the actors downstream the supply chain in order to mitigate the identified risks;
- e) by making this policy public by publishing it on its website (www.zoppasindustries.com).

I.R.C.A. S.p.A. Top Management