

DI LODOVICO SRL

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Design, prototyping and production of metal and composite materials components and equipment

Conflict Minerals Policy

Di Lodovico S.r.l supports the fight against human rights violations, violence and environmental degradation in the extraction and marketing of minerals from conflict-affected and high risk areas.

"Minerals from conflict areas" (also known as 3TGs) refer to gold, cassiterite (tin), columbite-tantalite (tantalum) and wolframite (tungsten) and/or their derivatives extracted in "conflict affected or high risk countries". Gains from their extraction and treatment may directly or indirectly finance armed groups engaged in civil war or they can contribute to precarious or non-existent governance, to systematic violations of international law or be the cause of forced labour and other human rights violations, as well as to promote corruption and money laundering.

EU Regulation 2017/821 of the European Parliament and of the Council of 17 May 2017 establishes duty of care in the supply chain for Union importers of tin, tantalum, tungsten and their derivatives and gold (referred to as 3TG) originating in conflict or high risk areas. It aims at ensuring that the supply of these minerals and metals imported into the EU is achieved in a responsible and sustainable manner.

The Regulation is based on the **2011 OECD Guidelines**, defining the international framework for the exercise of due diligence in the supply chain and stop the financing of armed groups in developing countries through the trade of the 3 TGs.

Di Lodovico S.r.l. does not directly buy raw minerals from conflict areas from any source and has no direct contact with mines, foundries and refineries that produce the metals used in its products; it is therefore not directly subject to these standards (upstream companies).

However, in full compliance with the requirements of EU directives it is aware of its responsibilities to ensure transparency in the supply chain (downstream companies). Therefore, as a manufacturer of aluminium, steel and resin moulds, equipment, control gauges and industrial automation in the field of AUTOMOTIVE and AEROSPACE Di Lodovico S.r.l undertakes to:

- do not knowingly procure materials containing specified minerals from mines in conflict-affected zones
- identify in good time which products may be affected by the legislation on minerals from conflict areas and to guide the compliance measures accordingly
- work with its suppliers and sub-suppliers to instruct them on these matters and provide information about their obligations of transparency. Supplier requirements for conflict minerals are specified in the supplier's manual and its compliance will be a relevant criterion for continuing supply and cooperation
- promote communication with suppliers to receive timely feedback on the use of 3TG minerals
- Follow a "Due diligence" programme in accordance with the Risk Assessment provisions applied to existing suppliers

Di Lodovico S.r.l. requires its suppliers to make an active commitment to ensure their supply does not come from conflict-affected zones but rather from conflict-free areas. It is their responsibility to carry out an adequate evaluation process and "Due diligence" activities to ensure a "conflict-free" supply that is valid and reliable.

Tortoreto, 04.04.2020

The Management