

CONFLICT MINERALS POLICY

Di Lodovico S.r.l. is committed to supporting the fight against human rights violations, violence, and environmental degradation associated with the extraction and trade of minerals sourced from conflict-affected areas.

So-called “conflict minerals,” also referred to by the acronym 3TG, include gold, cassiterite (tin), columbite-tantalite (tantalum), and wolframite (tungsten), as well as their derivatives. The profits generated from the extraction and processing of these minerals may directly or indirectly finance armed groups involved in civil conflicts, contribute to weak or absent governance, result in systematic violations of international law, fuel forced labour and other serious human rights abuses. Moreover, such activities may promote corruption and money laundering.

Regulation (EU) 2017/821 of the European Parliament and of the Council, adopted on 17 May 2017, sets due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold – collectively referred to as 3TG – originating from conflict-affected or high-risk areas. The purpose of the regulation is to ensure that the sourcing of these minerals and metals is conducted responsibly and sustainably. The regulation is based on the 2011 OECD Due Diligence Guidance, which serves as the international standard for supply chain due diligence practices, aiming to cut off funding to armed groups in developing countries.

Di Lodovico S.r.l. does not directly purchase raw minerals from conflict-affected areas and does not maintain direct relationships with mines, smelters, or refineries that produce the metals used in its products. Therefore, it is not directly subject to the obligations imposed on upstream companies. Nevertheless, fully aware of its responsibilities within the supply chain and the importance of transparency, the company is firmly committed to strictly complying with the requirements set out by European Union directives on the matter.

In this context, Di Lodovico S.r.l. is committed to:

- Refraining from knowingly sourcing materials containing the above-mentioned minerals from mines located in conflict-affected areas.
- Promptly identifying products that may fall under conflict minerals legislation and taking the necessary compliance measures.
- Actively engaging with suppliers and sub-suppliers to raise awareness on these issues and provide clear guidance regarding their transparency obligations. Supplier requirements related to conflict minerals are outlined in the Supplier Manual, and compliance with these requirements will be a key factor in maintaining business relationships.
- Promoting effective communication with suppliers to obtain timely feedback regarding the use of 3TG minerals.
- Implementing and maintaining a due diligence program in accordance with applicable regulations, including a risk assessment process for existing suppliers.

Di Lodovico S.r.l. requires its suppliers to actively commit to ensuring that all supplies come exclusively from “conflict-free” sources. It is the responsibility of the suppliers to implement appropriate assessment processes and due diligence activities to ensure responsible, valid, and verifiable sourcing.

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