

SAES GROUP

CONFLICT MINERALS AND COBALT SOURCING POLICY

1. BACKGROUND

SAES Group is aware of concerns that minerals mined in conflict areas in the Democratic Republic of the Congo (DRC), adjoining countries, and other conflict affected and high-risk areas may be making their way into the industry supply chain and may be fueling human rights violations and environmental degradation in the DRC region. In spite of not being legally bound by the Dodd Frank Act (see section 3), and by the EU conflict minerals regulation (EU 2017/821), SAES Group is committed to provide DRC conflict free products, by supporting industry-wide efforts to drive transparency in the supply chain and by expecting that our suppliers obtain materials from environmentally and socially responsible sources, including conflict free sources within the DRC, adjoining countries, and other conflict affected and high-risk areas.

2. REGULATORY REFERENCE

USA: DODD FRANCK ACT: public law 111–203—July 21, 2010, Dodd-Frank Wall Street Reform and Consumer Protection act section 1502.

EU: Conflict Minerals Regulation (EU 2017/821)

3. APPLICATION

This procedures applies to SAES Group suppliers of Products (including semi-finished); defined as all manufactured components, parts, assemblies and materials supplied to SAES Group Companies, when those goods contain, or may contain, Tantalum, Tin, Tungsten, Gold (hereby shortly defined as 3T+G) and Cobalt

4. ACKNOWLEDGE OF CONFLICT MINERALS REQUIREMENTS SPECIFICATION

Suppliers of products containing or possibly containing 3T+G and Cobalt are requested to acknowledge this Conflict Minerals and Cobalt Policy.

5. SUPPLIER DECLARATION PROCESS

SAES Group companies request their suppliers of goods containing, or possibly containing, 3T+ G minerals and Cobalt to supply a duly filled RMI file, whose latest version can be downloaded at <http://www.conflictreesourcing.org/conflict-minerals-reporting-template/> for 3T+G and <http://www.responsiblemineralsinitiative.org/reporting-templates/cobalt-reporting-template/> for Cobalt, or asked to environment@saes-group.com. The file must be emailed both to the local purchasing office and to environment@saes-group.com. Refuse to supply the above information will results a worsening of the vendor rating, and possibly in discontinuing the business relationships with the supplier.



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SAES Getters S.p.A.

6. Contact point

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