



## **Conflict Minerals Sourcing Policy**

Foroni S.p.A. is a private company and it is not publicly traded on the Italian Stock Exchange or other international securities Exchanges. Therefore, the rules established on August 22<sup>nd</sup>, 2012, by the US Securities and Exchange Commission by the Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act which applies to products containing any conflict minerals\*, do not apply to Foroni S.p.A..

However, it is Foroni corporate responsibility to operate its business activities fairly and ethically by respecting human rights and by complying with laws and regulations.

As part of responsibility, It is the policy of Foroni to avoid Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries\*.

In supporting this commitment and to comply with the spirit of the Dodd-Frank Act, Foroni has established a rigorous Conflict Minerals sourcing policy to ensure that its production is DRC conflict-free.

To achieve this result Foroni does:

- Purchase only “DRC Conflict free” materials by requesting a formal declaration from all its suppliers that all products supplied originate from non DRC and adjoining countries conflict areas.

- Provide, and expect its suppliers to cooperate in providing, due diligence information to confirm that any Conflict Minerals in its supply-chain do not support conflicts.
- Encourage its suppliers to do likewise with their suppliers.
- Immediately stop purchasing from suppliers which present a reasonable risk to be supporting conflicts.

Froni S.p.A. and its subsidiaries will always be committed to social responsibility and to respect human rights in business operations. Your contribution to this goal will be appreciated.

\*Cassiterite, Columbite-tantalite, gold and wolframite, or their derivatives, including tantalum, tin, and tungsten (often referred collectively to as “**Conflict Minerals**”) originating from the Democratic Republic of the Congo (DRC) and adjoining countries , including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia (collectively the “**Covered Countries**”) are sold by armed groups to finance conflicts in the covered countries.