



Policy for "conflict minerals"

On 22nd August 2012, the United States Securities and Exchange Commission adopted the final rules regarding "conflict minerals" as outlined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Conflicts Minerals Rules").

The objective of the Conflict Minerals Rules is to discourage the use of minerals whose trade might finance violent conflicts in Central Africa.

"Conflict minerals" include gold, columbite-tantalite (coltan), cassiterite, wolframite and their derivatives, specifically tantalum, tin and tungsten, regardless of their origin.

The "conflict minerals" that can have a negative impact in accordance with the Conflict Minerals Rules are those minerals that originate (or are extracted) in the Democratic Republic of the Congo (DRC) and/or bordering countries (Angola, Burundi, Central African Republic, Democratic Republic of the Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia) ("DRC Conflict Minerals").

The SMAT NORD Management is constantly committed to operating in a socially responsible manner.

This policy has been adopted to discourage the purchasing of "DRC Conflict Minerals" whose proceeds could be used to finance or help armed groups in the Democratic Republic of the Congo or in bordering countries, both directly and indirectly, regardless of their origin.

The global supply chain of these minerals, however, is complex and tracing them in our products from their source is a difficult challenge.

Although SMAT NORD does not acquire minerals directly from mines and foundries, in any case it is working with due diligence and has undertaken a process of awareness and full collaboration with its Suppliers to ensure that minerals coming from the "conflict minerals" regions are not used; moreover SMAT NORD commits itself not to deliberately source minerals from mines in the "Conflict Regions" and expects the same commitment from its Suppliers.

The SMAT NORD Management has drawn up, documented and distributed their Policy regarding "conflict minerals", ensuring that it is understood, implemented and followed by all levels of the organization.

The Policy in relation to "conflict minerals" is re-examined and, when necessary, updated as part of Management Review.

Almese, 18/02/2016

SMAT NORD CEO