

RESPONSIBLE MINERALS POLICY

by Gilardoni S.p.A. a Socio Unico

Gilardoni S.p.A. a Socio Unico (following GILARDONI) designs, manufactures and sells electrical and electronic equipment for medical, security and non-destructive-testing applications.

These products contain various minerals necessary for functionally including tantalum, tin, tungsten and gold (referred to as "3TG"). 3TG are sometimes known as "CONFLICT MINERALS"¹ because of concerns about their mining and sale contributing to armed conflict and human rights abuses in the Democratic Republic of the Congo (following DRC).

As such, GILARDONI undertakes to deliver to its consumers products manufactured in an ethical way consistent with our values around human rights, business ethics, labour, health and safety practices, and environmental responsibility and to comply with the laws in the countries in which it operates.

We believe this can be done while continuing to source responsibly from the DRC, other high-risk regions and artisanal and small-scale mines, supporting those companies which work in accordance with the OECD Due Diligence Guidance, for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (following CAHRA's).

GILARDONI, consistent with our belief in the dignity of, and respect for, individuals, as demonstrated in our policies, Code of Ethics and labour practices, with this *Responsible Mineral Policy*, confirms to uphold and respect European and international standards regarding the human right for all people and not contribution to conflict or financing of armed conflict.

GILARDONI does not ban procurement of minerals from the DRC and adjoining countries but seeks to source from responsible conflict-free sources in the region, considering GILARDONI does not directly source CONFLICT MINERALS from mines, smelters or other refiners, and is in most cases several levels higher existing from these market participants.

To enable our commitment to responsible CONFLICT MINERALS sourcing, GILARDONI influence upstream supply chain actors through our policies, practices and the entire certified Quality System, based on procedure, aimed to guarantee the conformity of its products to:

- ✓ Dodd-Frank Wall Street Reform and Consumer Protection Act about the use of Conflict Minerals from DRC and adjoining countries and European Regulation 2017 /821/UE;
- ✓ Annex II of OECD Due Diligence Guidance for Responsible Supply Chains;

and as also in general to the other European directives and regulations such as:

- ✓ 2011/65/UE RoHS 2 and the succeeding 2015/863/UE;
- ✓ 1907-2007-CE Reach Regulation.

To respect them, **GILARDONI** has adopted the following practices:

- Instituted an assessment of its supply chain, through a continuous collection, archiving and updating of declarations and documentation from its single suppliers, aware that such regulations have frequent updates, leaving anyway the responsibility of the truthfulness of their declarations and their chain to them;
- Collaborate with suppliers to confirm 3TG usage and potential sources of these minerals;
- Require the distribution of the *Conflict Minerals Policy* and the conflict minerals reporting template to all new and current suppliers.

Compatibly with production requirements GILARDONI gives preference to the use of suppliers that can guarantee to adhere to the following guidelines when procuring CONFLICT MINERALS for use in our product and, in particular, expects that its suppliers:

- Support our ethical procurement practices and guidelines when procuring CONFLICT MINERALS for use in our product, continuing supporting economic activity in DRC region Sourcing 3TG only from smelters and refiners validated as conformant to the Responsible Minerals Assurance Process third party assessment program;
- Respond in full to any surveys or requests for information, certifications, and documentation any time GILARDONI shall deem necessary to monitor or assess compliance with this policy and promptly implement corrective actions identified and requested by us;
- Adopt and maintain a policy to assure that the 3TG in the products they manufacture do not directly or indirectly contribute to significant adverse human rights impacts in CAHRA's, including in the DRC, such as armed conflict, forced and child labour and environmental degradation consistent with the Company's stance.
- Establish their own OECD-aligned due diligence program to achieve responsible mineral supply chains.

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Marco Taccani Gilardoni
President

¹ Conflict minerals are defined by the United States Securities and Exchange Commission in Section 1502 of the Dodd-Frank Act as cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, or any other minerals or their derivatives determined by the Secretary of State to be financing conflict in the Covered Countries, which include the DRC or an adjoining country.