

# Responsible Minerals Sourcing Policy



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## 1. ACRONYMS

CAHRAs	Conflict-Affected and High-Risk Areas
CM	Conflict Minerals
CMRT	Conflict Minerals Reporting Template
DRC	Democratic Republic of the Congo
EM	Extended Minerals
EMRT	Extended Minerals Reporting Template
LBMA	London Bullion Market Association
NGOs	Non-Governmental Organizations
OECD	Organisation for Economic Co-operation and Development (Framework)
RBA	Responsible Business Alliance
RJC	Responsible Jewellery Council
RMAP	Responsible Minerals Assurance Process
RMI	Responsible Minerals Initiative
SEC	Securities & Exchange Commission
SOR	Smelters or Refiners
3TG	Tantalum, Tin, Tungsten and Gold (Conflict Minerals)

## 2. BACKGROUND

Eldor Corporation SpA ("Eldor", "the Company", "we", "us") is committed to the responsible sourcing of materials used in our products - sourcing done in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain.

At present, our due diligence program includes Conflict Minerals (3TG: Tin, Tantalum, Tungsten, Gold) and Extended Minerals (Cobalt, Mica).

The equipment and many of the spare parts we produce include components that may contain some of the above minerals. We do not directly purchase these minerals, nor do we have any direct relationship with mines or smelters that process these minerals: we rely on our direct and lower-tier suppliers to provide information on the origin of any conflict/responsible/critical minerals contained in parts sold to us.

Along with governments, NGOs, the investment community and many other companies worldwide, we are concerned about human rights violations including labour abuses, child labour and environmental degradation occurring anywhere in the world, as well as the role that armed conflicts play in causing extreme violence across the so-called CAHRAs (Conflict-Affected and High-Risk Areas). This topic is dealt within the "OECD Due Diligence Guidance for Responsible Chains of Minerals from CAHRAs" and has also

been addressed by the legislators in various regions, including the United States of America and the European Union.

### **3. OUR COMMITMENTS**

Our program complies with all relevant legal requirements and reflects international best practice including, but not limited to, the OECD Guidance and the RBA Code of Conduct.

We expect our suppliers to follow this same framework and to have the same high standards. This policy is referenced on our *Supplier Code of Conduct* (PC POL 020), and we require adherence to this policy as well as to the Responsible Business Alliance (RBA) Code of Conduct and all other applicable laws.

Currently, regulations focus on minerals sourced from the Democratic Republic of the Congo (DRC) and adjoining countries (known as the covered countries) where these minerals are often smelted and traded. Smelters and refiners are in fact “pinch points” in the conflict minerals supply chain because they purchase raw materials from many locations and once the metals have been smelted it becomes near impossible to accurately trace their sources. Thus, the aim is to help companies avoid inadvertently contributing to human rights and environmental issues: under no circumstances the mandate constitutes an embargo on the trade of conflict minerals from all covered countries - in those regions where conflict and poor labour practices in mining operations are more prevalent, we are committed to supporting those suppliers who practice responsible sourcing.

### **4. OUR MEASURES**

Eldor is moving toward due diligence for a broader set of responsible minerals beyond 3TGs. As a first step, we have included Cobalt in our Responsible Minerals Sourcing management.

We collect due diligence information related to where and how minerals are extracted through standardized templates developed and released by the RMI (Responsible Minerals Initiative). In particular, we use the CMRT (Conflict Minerals Reporting Template) for 3TGs and the EMRT (Extended Minerals Reporting Template) for Cobalt and Mica.

In working towards our commitments, we have taken a number of steps that include:

- working with specialized external providers to run solid Conflict Minerals programs, in line with the OECD framework;

checking CMRTs and EMRTs from suppliers (Tier-1) with the support of our providers, as described in the *Conflict Minerals Compliance Management* instruction (IS 360 126) and the *Extended Minerals Compliance Management* instruction (IS 360 339);

- when necessary, further due diligence steps are scheduled (for example, in case of non-Active/Conformant smelters are present);

- encouraging our Suppliers to implement a policy regarding Responsible Minerals sourcing and exercise due diligence to investigate the source of these minerals, also providing them with online platforms and webinars to increase their awareness on these important topics.

At the same time, we require our direct suppliers to:

- establish a Responsible Minerals policy consistent with the standards we uphold, including OECD Guidance and RBA Code of Conduct;
- work with us to identify relevant SORs of 3TG, Cobalt and Mica in our supply chain and report the information gathered using CMRTs and EMRTs;
- purchase sub-components from lower-tier suppliers who source minerals from SORs that are participating in third-party audit programs (such as RMAP, LBMA, RJC) and working towards certification.

We look forward to expanding our Responsible Sourcing programs over time and to include other minerals or materials relevant to our business that may become a concern, as appropriate due diligence tools became available. With that, we continue to apply diligence to the responsible sourcing landscape and are committed to acting accordingly.

For any grievance reporting or inquiry about this policy, please contact Eldor Corporation through [conflict.minerals@eldor.it](mailto:conflict.minerals@eldor.it).



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