

Conflict Minerals Policy

Fir Elettromeccanica srl supports the goal of promoting socially and environmentally responsible procurement of materials used in our products. This includes restricting the use of cassiterite, wolframite, coltan (which are the ores that contain tin, tungsten, and tantalum, respectively), and gold mined in the Democratic Republic of Congo (“DRC”) or adjoining countries in conditions of armed conflict and human rights abuses.

The complex path of processing, refining and fabrication that bring metals to us makes it difficult, if not impossible, to trace the minerals origins. Due to these complexities, we are currently unable to verify the origin of all the metals used in our products today. Despite these challenges, it is Fir Elettromeccanica srl policy to refrain from purchasing from any known conflict sources, and we expect our suppliers to adhere to the same standards. We are working to implement systems and processes to enable us, with a high degree of confidence, to declare that our supply chains are free of conflict minerals. To support this effort, we expect that our suppliers will comply with our requests to provide declarations and perform due diligence about the source of these minerals in their products provided to us.

The U.S. Congress included provisions in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 to address conflict minerals. Pursuant to those provisions, the Securities and Exchange Commission (SEC) recently adopted the final rules for disclosure and reporting requirements regarding the use of conflict minerals from the DRC. In both the letter and the spirit of these provisions and rules, Fir Elettromeccanica srl plans to continue its efforts to find ways to source conflict-free minerals and achieve a conflict-free supply chain.