

Conflict Minerals Declaration

The US Securities and Exchange Commission (SEC) has adopted on August 22, 2012 final rules relating to “conflict minerals” under section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act passed into law in July 2010.

“Conflict Minerals” refers to specific minerals originating from mines controlled by armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia); hence cassiterite, columbite-tantalite (coltan), wolframite and Gold are considered conflict minerals, minerals from which Tin, Tantalum, Tungsten and Gold (3TG) are their derivatives.

OMCD Group (our affiliates, including, but not limited to, F.I.L.M.S. S.p.A., Harditalia srl, Scleros S.p.A., and Dimotek) is committed to operating in a socially responsible manner within the supply chain to ensure that 3TG raw materials are sourced in a manner that does not support or benefit illicit armed conflict or contribute to grave human rights abuses or violations in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

To this end, we closely work with our supply chain to strengthen compliance and ensure only “DRC Conflict Free” materials are used. Consequently, we require our suppliers to determine the sources and conflict status of the 3TG supplied to us, and to provide assurance that all products are “Conflict Free”. Base on the written assurance OMCD Group (our affiliates, including, but not limited to, F.I.L.M.S. S.p.A., Harditalia srl, Scleros S.p.A., and Dimotek) has received from all its suppliers, OMCD Group’s products do not contain minerals originating from Democratic Republic of Congo (DRC) and its adjoining countries.

It is our requirements that suppliers not supply OMCD Group with any products that the supplier cannot certify as “DRC Conflict Free” with the meaning of the Conflict Minerals Rules.

Alberto Tedeschi
Member of the board

