

SOMASCHINI CONFLICT MINERALS DECLARATION

Background:

Armed groups operating in the Democratic Republic of Congo and surrounding region control many of the region's mines or transit routes and have engaged in armed conflict, as well as inhumane treatment of local populations. Concern that proceeds from the mining of minerals have been used to fund violence in that region led the United States to enact a law requiring many companies to report publicly on their use of "conflict minerals" in the products they manufacture. The law requires companies to conduct an inquiry into the existence and origin of tin, tantalum, tungsten and gold in their supply chains. If these minerals come from the Democratic Republic of Congo or the surrounding region, or if their country of origin is uncertain, then companies will have to conduct a more thorough review of their supply chain in an attempt to determine whether such minerals used by the manufacturer support armed groups in the Democratic Republic of Congo or the surrounding region.

This policy is not intended to ban procurement of tin, tungsten, tantalum or gold or other products from the Democratic Republic of Congo or the surrounding region, but to promote sourcing from responsible sources in the region.

SOMASCHINI's Commitment:

1. To carry out its supply chain due diligence consistent with the Organization for Economic Cooperation and Development (OECD) guidelines.
2. To make reasonable efforts: a) to know, and to require each Somaschini supplier to disclose, whether tin, tantalum, tungsten and gold is used or contained in its products; b) if such minerals are contained in the products purchased from such suppliers, to identify the source of such minerals, and c) to eliminate procurement, as soon as commercially practicable, of products containing tin, tungsten, tantalum and gold obtained from sources that fund or support inhumane treatment in the Democratic Republic of Congo or the surrounding region.
3. To require Somaschini suppliers to assist Somaschini to comply with the disclosure requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, and the rules of the U.S. Securities and Exchange Commission promulgated as required by that law.

In order for Somaschini suppliers to meet their commitments under this policy, Somaschini expects that its suppliers will perform a reasonable inquiry into the existence and origin of tin, tantalum, tungsten and gold in their supply chains and provide written evidence of the due diligence documentation.

Concerns and violations of this policy can be reported to Somaschini using Somaschini's website or the internal intranet through which any person may make an anonymous report of any ethical or compliance concern.

March 2019

Signed

