

Ge.Ba. srl “Conflict Minerals” policy

In 2012, the Securities and Exchange Commission (SEC) issued its Conflict Minerals Rule along with guidance for how companies should report on the source of the conflict minerals in question: tin, tungsten, tantalum, and gold. Based on what it’s reported on The Dodd Frank Act Section 1502, part of the U.S. government’s Dodd-Frank Wall Street Reform and Consumer Protection Act, signed into law in July 2010.

The Regulation is designed to provide transparency and certainty regarding the supply practices of Union importers, as well as smelters and refiners, sourcing from conflict-affected and high-risk areas. The Regulation therefore imposes supply chain due diligence obligations on Union importers of minerals or metals containing or consisting of tin, tantalum, tungsten or gold as set out in Annex I and on due diligence scheme holders.

The Regulation (EU) 2017/821 establishes obligations for EU importers to perform and report on due diligence in their supply chains, where their annual imports of the specified minerals exceed certain thresholds as set out in Annex 1 of Regulation (EU) 2017821.

Ge.Ba. Srl supports the fight against violence, against the violation of human rights and environmental degradation in the extraction and marketing of certain minerals (cassiterite, columbite-tantalite, and wolframite from which gold, tin, tantalum and tungsten are obtained) from the African Great Lakes area defined as Conflict Region. The region includes the Democratic Republic of Congo (DRC) and adjacent countries. The profits from the extraction and marketing of these minerals finance armed groups and contribute to the occurrence of inhuman treatment, such as human trafficking, slavery, and/or child labor, torture and war crimes.

Although Ge.Ba. Srl handles these minerals within the limits allowed by the law decree, is committed to:

- Not to voluntarily purchase materials and/or components containing the specified metals from mines and smelters located in the “Conflict Region”.
- Establishing to be in a position to fulfill our reporting obligations to the SEC and respond to customer inquiries.
- Asking to our suppliers, so that they respond in a timely manner to our requests for evidence of compliance, assuring the material is “Conflict Free”.

