

Company policy on CONFLICT MINERALS

Minifaber spa is committed to the responsible sourcing of minerals commonly known as “Conflict Minerals”.

Minifaber spa undertakes to comply with:

- Regulation (EU) 2017/821 on the 3TG supply chain due diligence.
- Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

To ensure that its products do not contribute to the financing of armed groups or to human rights violations, Minifaber spa requires its suppliers to use only smelters and refineries that comply with international standards - such as those of the Responsible Minerals Initiative - and to provide complete, verifiable information through tools like the CMRT or EMRT.

This obligation covers minerals such as tin (Sn), tantalum (Ta), tungsten (W) and gold (Au) - collectively known as 3TG - as well as any additional minerals identified by applicable regulations.

We continuously assess the risks associated with mineral sourcing and supplier transparency, implement mitigation measures when necessary, and reserve the right to suspend business relationships in cases of non-cooperation.

Traceability and documentation systems are maintained to ensure full transparency for customers and stakeholders, while internal staff and key suppliers receive dedicated training on responsible sourcing.

The policy is published and updated periodically to reflect any regulatory changes or changes in the supply chain.

Seriate, 15/12/2025

Chairman

Raffaello Melocchi



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