

CONFLICT MINERALS DECLARATION

The European Union has issued specific Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 which "establishes obligations regarding the duty of care in the supply chain for Union importers of tin, tantalum and tungsten, their minerals, and gold, originating in conflict-affected or high-risk areas", which will apply starting from **January 1, 2021** for importers of tin, tantalum, tungsten and gold, whether in the form of raw minerals, concentrates or processed metals, based in the EU.

The Securities and Exchange Commission (SEC) has enacted legislation regarding the disclosure and disclosure requirements relating to "Conflict Minerals", as outlined in the 2010 "Dodd-Frank Wall Street Reform and Consumer Protection Act".

"Materials from conflict areas" are those materials originated from the Democratic Republic of Congo or adjacent countries ("DRC countries") for the manufacture of products.

The proceeds from the sale of these minerals from the mines located in the "Conflict-Minerals" region finance local inter-ethnic conflicts, and are therefore associated with civil wars in the Democratic Republic of Congo and with the financing of armed groups committed to acts of violence in the DRC and in some neighbouring countries of the area.

"Materials from Conflict Areas" include:

- columbite-tantalite, also known as coltan (metal mineral from which tantalum is extracted);
- cassiterite (the mineral metal from which tin is extracted);
- gold;
- wolframite (the mineral metal from which tungsten is extracted);

Le regole richiedono che i produttori comunichino se i prodotti da essi fabbricati contengono "Conflict Minerals" che sono "necessari per la funzionalità o la produzione" di tali prodotti.

The company **Chiaravalli Group SPA** headquarter in Via per Cedrate, 476, Cavaria con Premezzo (VA), Italy:

- undertakes to comply with the US law ("**Dodd-Frank Wall Street Reform and Consumer Protection Act**") relating to minerals from mines located in the "Conflict-Minerals" region and with Regulation (EU) 2017/821 of the European Parliament and of the Council.
- declares that the following Conflict Minerals are necessary for the functionality / production of its products:
 -, present in in the percentage equal to..... %
 -, present in in the percentage equal to..... %
 -, present in in the percentage equal to..... %
- Chiaravalli Group SPA** declares that Conflict Minerals are not required for the functionality / production of its products.
- undertakes in particular to:
 - Do not knowingly source the specified metals that come from "Conflict Region" mines that are not certified as "Conflict Free".
 - Require their suppliers to undertake an appropriate evaluation process with their supply chains in order to ensure that the specified metals come only from:

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- Mines and foundries outside the "Conflict Region"
 - Mines and foundries that have been certified by an independent third party as "Conflict Free", if located within the "Conflict Region".
 - Collect all the useful information to trace the supply chain of these minerals and to promulgate a policy of sharing information with its suppliers and customers.
 - Implement due diligence policies that ensure with reasonable certainty that the products and components supplied, containing "conflict minerals", come from areas outside the Conflict Region or from mines and / or foundries certified Conflict-Free by an independent third party.
- is not aware of the possible presence in its supply chain of "Conflict Minerals" as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and California Senate Bill 861.

Quality Manager
Antonino La Mantia

