



CONFLICT MINERALS POLICY

On 22 August 2012, the United States Securities and Exchange Commission (SEC) adopted conclusive rules regarding “Conflict Minerals” pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Conflict Mineral Rules”).

The purpose of the Conflict Minerals Rules is to discourage the use of minerals that might be financing the violent conflict within Central Africa. “Conflict minerals” are gold, Columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives, which are currently limited to tantalum, tin, and tungsten, regardless of their source. Conflict minerals that can lead to adverse consequences under the Conflict Minerals Rules are those that originate in (or are mined from) the Democratic Republic of the Congo (DRC) and/or adjoining countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda, and Zambia) (“DRC Conflict Minerals”).

Sesa Group is committed to implement a socially responsible sourcing policy respecting human rights and avoiding contributions to any conflicts through its mineral indirect purchasing decisions and practices within its supply chain.

In accordance with the statement of the Sesa Code of Ethics regarding the principles of social responsibility, human rights and discrimination, Sesa Group is committed not to procure knowingly any components that contain any of the conflict minerals originating from facilities in the “Conflict Region” that are not certified as “conflict -free”.

Sesa Group expects all its suppliers of components containing 3TGs will put reasonable effort to report the conflict minerals status and their policy on the topic. In support of this, Sesa asked and will continue to ask for declarations from sourced and managed suppliers in order to ensure transparency in its supply chain.

All suppliers must pass this requirement up the supply chain and determine the source of specified minerals. Where a source is declared as coming from the “Conflict Region”, Sesa will request those relevant suppliers to change their source. In case, for somewhat different reasons, there is no immediate alternative source found, as part of our contract manufacturing responsibility, Sesa will work in collaboration with relevant suppliers to identify, qualify and source for alternative part or solutions.

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Sesa S.p.A.

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