

Sanval Electronic S.r.l. “CONFLICT MINERALS” Policy

Sanval Electronic supports ending the violence, human rights violations and the environmental degradation in the mining and trading of certain minerals (gold, as well as tin, tantalum, and tungsten, derivatives of cassiterite, columbite-tantalite, and wolframite) from a location described as the “Conflict Region”, situated in the Democratic Republic of the Congo (DRC) and surrounding countries.

The U.S. Securities and Exchange Commission (SEC) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers to disclose whether the products they manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

Sanval Electronic commitment:

- Do not knowingly procure specified metals that originate from mines in the “Conflict Region” that are not certified as “conflict free”.
- Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from:
 - o Mines and smelters outside the “Conflict Region” or
 - o Mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”.

Sanval Electronic has obtained or is in the process of obtaining information from its suppliers concerning the origin of the raw materials used to produce gold, tin, tantalum and tungsten, used in the products supplied to Sanval Electronic, originate from outside the “Conflict Region” or that the mines or smelters be certified as “conflict free” by an independent third party. The aim is to ensure that only “conflict free” materials and components are used in products that we procure.

If we discover the use of these minerals produced in facilities that are considered to be “non-conflict free”, in any material, parts or components we procure, we will take appropriate actions to transition product to be “conflict free”.