REVISION TABLE

Rev.	Rev. date	Description	Prepared by	Checked by	Approved by
00	10/11/2023	First issuance of Italian version	RASGI	RASGI	COO
01	04/06/2025	Heading format and document classification update	Addetto Gestione CQ	RASGI	COO
02	01/10/2025	First English translation and content update	Addetto Gestione CQ	RASGI	COO
03	10/11/2026	Insertion of Revision Table	COO	RASGI	COO

CONFLICT MINERALS DECLARATION

(Minerals from Conflict-Affected and/or High-Risk Areas)

The European Union issued Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017, which "establishes supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas." This regulation has been in force since 1 January 2021 and applies exclusively to EU-based importers of tin, tantalum, tungsten, and gold—whether in the form of raw ores, concentrates, or refined metals.

The U.S. Securities and Exchange Commission (SEC) has implemented regulations concerning the disclosure requirements for "Conflict Minerals," as mandated by the **Dodd-Frank Wall Street Reform and Consumer Protection Act** of 2010.

"Conflict Minerals" are materials sourced from the Democratic Republic of the Congo (DRC) or adjoining countries ("DRC Countries") used in the manufacturing of products. Profits from the sale of these minerals, mined in the "Conflict Minerals" region, are known to finance local inter-ethnic conflicts, and are thus associated with civil wars in the DRC and the funding of armed groups engaged in violence in the DRC and neighboring countries.

Conflict Minerals include:

- Columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted);
- Cassiterite (the metal ore from which tin is extracted);
- Gold;
- Wolframite (the metal ore from which tungsten is extracted);
- Any other mineral or its derivatives designated by the U.S. Secretary of State as financing conflict in the DRC countries.

The rules require manufacturers to disclose whether the products they produce contain “Conflict Minerals” that are “necessary to the functionality or production” of those products.

ESSEGI SYSTEM SERVICE S.R.L., headquartered in Creazzo (VI), via Zambon 14–16, is committed to complying with the U.S. law ("Dodd-Frank Wall Street Reform and Consumer Protection Act") regarding minerals sourced from the "Conflict Minerals" region, as well as Regulation (EU) 2017/821 of the European Parliament and Council.

The company further commits to:

- Not knowingly procuring specified metals originating from mines in the "Conflict Region" that are not certified as “Conflict-Free”;
- Requiring its suppliers to undertake an appropriate due diligence process within their supply chains to ensure that specified metals are sourced only from:
    - Mines and smelters located outside the "Conflict Region";
    - Mines and smelters within the "Conflict Region" that have been certified by an independent third

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party as “Conflict-Free”;

- Collecting all relevant information to trace the supply chain of such minerals and implementing a policy of information sharing with suppliers and customers;
- Implementing due diligence policies to reasonably ensure that the supplied products and components containing “Conflict Minerals” originate from outside the Conflict Region or from mines and/or smelters certified as Conflict-Free by an independent third party.

ESSEGI SYSTEM SERVICE S.R.L. declares that it has no direct knowledge of the possible presence of “Conflict Minerals” within its supply chain, as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the California Senate Bill 861.

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