



Conflict Minerals and Cobalt Policy

Conflict Minerals

On August 22, 2012, the United States Securities and Exchange Commission (SEC) announced the adoption of definitive rules relating to conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Conflict Minerals Rules”).

The objective of the Conflict Minerals Rules is to discourage the use of minerals whose trade could finance violent conflicts in Central Africa.

Conflict minerals include **Gold**, columbite-tantalite (coltan), cassiterite, wolframite, and their derivatives, currently limited to **Tantalum, Tin, and Tungsten**, regardless of their origin. **They are also known as 3TG minerals (from the initials of their names in English) and are mainly used in the electronics and jewelry industries.**

Conflict minerals, which may have negative consequences under the Conflict Minerals Rules, are minerals that originate (or are mined) in the Democratic Republic of Congo (DRC) and/or neighboring countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda, and Zambia) (“DRC Conflict Minerals”).

Cobalt and Mica (later extended to Copper, Lithium, Nickel, and Natural Graphite)

These minerals are identified as “critical raw materials,” essential for the global energy transition and the production of modern technologies, particularly lithium-ion batteries.

More than 70% of the world's cobalt comes from the Democratic Republic of Congo (DRC).

Although cobalt and the other minerals above are not listed as “conflict minerals” in the Dodd-Frank Act or the European Conflict Minerals Regulation, their extraction puts many Congolese communities at risk.

In fact, several social and environmental issues have been highlighted **in relation to their extraction from more “artisanal” mines**, including child labor and unsafe working conditions.

Date	Change	Description	Revision
29/07/2019	Emission		1
13/07/2021	Upgrade	Cobalt section	2
12/01/2026	Upgrade	Conflict Minerals and Cobalt sections	3



The A. Benevenuta & C. Spa Management is constantly committed to operating in a socially responsible manner.

This is the policy that has been adopted to discourage the purchase of “DRC Conflict Minerals” and to promote the use of “ethical” cobalt (**and other critical minerals**), i.e., sourced from certified mines.

However, the global supply chain for these minerals is complex, and tracing the minerals in our products back to their origin is a complicated challenge.

Although it does not purchase minerals directly from mines and smelters, A. Benevenuta & C. Spa has undertaken a process of awareness-raising and collaboration with its suppliers to ensure that conflict minerals and cobalt (**and other critical minerals**) are not used, and requires the same commitment from its suppliers.

The A. Benevenuta & C. Spa Management has formulated, documented, and disseminated its policy on conflict minerals and cobalt, ensuring that it is understood, implemented, and maintained at all levels of the organization.

The "Conflict Minerals and Cobalt Policy" is reviewed and, if necessary, updated during Management Review.

Date

12-Jan-2026

The Management

D. Ruffatto / P. Bianco / M. Pizzo

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