

CONFLICT MINERALS POLICY

Whereas:

- The Regulation (EU) 2017/821, which was published in 2017, lays down 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 new EU Conflict Minerals legislation, applicable from 1 January 2021, requires all Union importers of minerals and metals containing tin, tungsten, tantalum and gold to carry out analysis and checks in order to ensure that due diligence obligations are met throughout their entire supply chain;
- On August 22 of 2012, the United States Securities and Exchange Commission ("SEC") announced the adoption
 of final rules relating to "Conflict Minerals" under Section 1502 of the Dodd-Frank Wall Street Reform and
 Consumer Protection Act ("Conflict Minerals Rules"),

Despite Aesys is not an importer of these metals, it is committed to operating in a socially responsible manner and has a policy of discouraging the purchase of Conflict Minerals from the Conflict Region that are not certified as Conflict Free.

As a <u>downstream purchaser</u> of materials or components that may contain "Conflict Minerals" and not having direct dealings with smelters or refiners, the due diligence measures taken by Aesys provide reasonable confidence as to the source of the Conflict Minerals.

Aesys requires its suppliers to purchase/produce using only responsible sources and to provide, upon request, adequate verification of the country of origin and source of materials used in the products they supply.

In particular, Aesys is committed to:

- Periodically assess whether there are any negative Conflict Minerals effects in its own supply chain;
- Train its own employees on the importance of fulfilling Conflict Minerals management requirements;
- Not intentionally procure "Conflict Minerals" from the "Conflict Region" that are not certified as "Conflict Free";
- Require its suppliers to implement an appropriate evaluation process throughout their supply chain to ensure that the specified metals come only from
 - o mines and smelters outside the Conflict Region;
 - mines and smelters within the "Conflict Region" that are certified by an independent third party as "Conflict Free";
- collect, where applicable, information from their suppliers attesting to their diligence in the supply chain in order to reduce the risk of Conflict Minerals.

The aim is a gradual elimination of non "Conflict-Free" minerals in the materials, parts, and components purchased and used by Aesys.

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