



## **RIRI Corp. Conflict Minerals Policy**

Mendrisio 01/01/2017

This document contains our policy regarding the use of conflict minerals (as defined below) in our products. "RIRI," "we," "its," "us" and "our" refers to RIRI SA and its consolidated subsidiaries.

This policy will be reviewed and updated as needed.

### **Regulatory Overview**

Violence and human rights violations are occurring at the hands of armed groups in connection with the mining of certain minerals from locations in the Democratic Republic of the Congo (the "DRC") and its adjoining countries (together with the DRC, the "Covered Countries").

In July 2010, President Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. On August 22, 2012, the Securities and Exchange Commission (the "SEC") adopted a conflict minerals rule (the "Conflict Minerals Rule") as mandated by Section 1502 of the Dodd-Frank Act. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the DRC.

We are required to engage in a reasonable country of origin inquiry to determine whether the conflict minerals originated in one of the Covered Countries and to make certain disclosures on an SEC form to the extent that such conflict minerals are necessary to the functionality or production of products that RIRI contracts to manufacture. Additional due diligence and disclosure obligations are triggered to the extent that the conflict minerals are from a Covered Country or we are unable to determine the source of the conflict minerals.

A copy of template is available link at:

<http://www.conflictreesmelter.org/ConflictMineralsReportingTemplateDashboard.htm>

"Conflict minerals" are cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. This term applies irrespective of the origin of the minerals or their derivative metals. In addition to the DRC, the Covered Countries are: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

### **RIRI Policy Statement**

RIRI takes its obligations under SEC and other regulations seriously. RIRI also has adopted this policy as part of our larger efforts to encourage our suppliers to respect human rights and not contribute to conflict.

RIRI does not directly source conflict minerals from mines, smelters or refiners, and is not in a position to identify on its own these market participants. We therefore require the cooperation of our suppliers in the implementation of this policy and in enabling RIRI to meet its SEC compliance obligations.

## Supplier Requirements

Suppliers who supply or manufacture components, parts or products containing conflict minerals are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict or human rights abuses. Without limiting the foregoing, suppliers are expected to directly and indirectly source conflict minerals only from sources that do not directly or indirectly finance or benefit "armed groups" (as that term is defined in the Conflict Minerals Rule) in a Covered Country. This policy applies to conflict minerals contained in components or parts of products supplied to or manufactured for RIRI, irrespective of who has manufactured or provided the specifications for the particular component or part.

In furtherance of this policy, suppliers are expected to:

- implement and communicate to their personnel and suppliers policies that are consistent with this policy;
- familiarize themselves with the Conflict Minerals Rule and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas available at <http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf> (the "Guidance").
- put in place procedures for the traceability of conflict minerals, working with their suppliers as applicable;
- where possible, source conflict minerals from smelters and refiners validated as being conflict free;
- maintain reviewable business records supporting the source of conflict minerals;
- from time to time, at our request, provide to us written certifications and other information concerning the origin of conflict minerals included in products, components and parts supplied to RIRI and the supplier's compliance with this policy generally;
- adopt a risk management strategy with respect to identified risks in the supply chain that is consistent with this policy;
- otherwise establish policies, due diligence frameworks and management systems that are consistent with the Guidance; and
- require their direct and indirect suppliers to adopt policies and procedures that are consistent with those contained herein. Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.



### **Assessing and Responding to Identified Risks**

RIRI believes in establishing and maintaining long-term relationships with suppliers whenever possible. If we determine that a supplier may be violating this policy, we may require that supplier to commit to and implement a corrective action plan within a reasonable timeframe. Continued failure to adhere to RIRI's policies and refusal to address issues of concern may lead to termination of our business relationship with the supplier. Nothing contained in this policy shall be interpreted to preclude RIRI from terminating any supplier relationship at any time for any reason.

Thank you in advance for your collaboration.

RIRI SA