



Conflict Minerals Policy

Approved by the Board of Directors of SECO S.p.A. on 22/12/2022

1. Context definition

SECO S.p.A. ("SECO"), with its wide offering of cutting-edge technological solutions, is among the European leaders in edge computing and AI analytics solutions, and, as such, has a responsibility to ensure that all its business activities and regions in which it operates adhere to the highest ethics values declared in the SECO "Code of Ethics". This commitment refers in particular to the responsible sourcing and respect for human rights in SECO's operations and supply chain.

Technological products are manufactured using components that may contain small amounts of precious minerals and metals, including, but not limited to, copper, gold, palladium, silver, tantalum, tin and tungsten. Although SECO does not operate any mining activities, nor trades or sources minerals directly, it may be indirectly exposed to the issue of conflict minerals via its supply chain of electronic components, which mainly consists of silicon vendors and distributors.

The expression "conflict minerals" is used to define certain minerals and metals which potentially originate from, or are linked to, conflict-affected and high-risk areas ("CAHRAs") as defined by the Organisation of Economic Co-Operation and Development (the "OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance").

In particular, there could be a negative social or environmental impact from the extraction and/or processing of these minerals in geographical areas where the related revenues may, directly or indirectly, finance or benefit armed groups engaged in civil war, resulting in violations of international law and human rights abuses (forms of torture, cruelty, inhuman and degrading treatment, forced or compulsory labor, child labor).

In July 2010, the United States passed Resolution HR4173, Section 1502(b) of the Dodd-Frank Financial Reform Bill, which, by becoming a US federal law, requires all listed companies in the United States and their suppliers to disclose the chain of custody and usage of conflict minerals (Tin, Tantalum, Tungsten, and Gold, usually indicated by the acronym "3TG"). The EU Conflict Minerals Regulation (2017/821) that followed was then largely inspired by the aforementioned US Act.

While SECO is not required by law to report on conflict mineral sources, by extending its efforts beyond mere legal compliance, we strongly believe that we can contribute to foster responsible sourcing practices within our industry sector. It is on this firm belief that present Conflict Minerals Policy (hereinafter, also the "Policy") is based.

2. Socially responsible sourcing

With this Policy, SECO declares its commitment to implement a socially responsible sourcing policy that helps respect human rights and avoid contributing to any conflicts through its mineral indirect purchasing decisions and practices throughout its entire supply chain.

SECO makes all necessary efforts not to knowingly receive any components that contain conflict minerals from plants based in regions that are not certified as conflict-free. In order to ensure the same compliance at every stage of the supply chain, SECO requires its suppliers of electronics components which may contain one or more 3TGs to increase transparency by investigating and determining the source of the used raw materials, by undertaking appropriate due diligence.

In support of this, SECO has and will continue to request statements from its suppliers on their conflict minerals status and policies on the topic.

All suppliers are required in their turn to submit this request along the supply chain in order to determine the origin of the specified minerals. In case a source is declared as coming from one of the conflict regions, it will be requested to the supplier to change their procurement source. In the event that, for somewhat different reasons, there is no immediate alternative source found, as part of its manufacturing responsibility, SECO will work in collaboration with the involved supplier(s) to identify, qualify and source for alternative parts or solutions.

Any other violation of this Policy, such as lack of cooperation from suppliers, will require SECO to take appropriate corrective action and could result in up to and including reduction or termination of business relationships with the non-compliant supplier.

Any interested party, including employees, suppliers, partners, and others who deal with SECO in any capacity, may report credible information regarding a violation or suspected violation of this Policy to SECO's ESG team at the following e-mail address: esg@seco.com. To guarantee the integrity of reporting procedure, the process is regulated in such a way as to ensure the confidentiality of the reporter, including in compliance with the procedures and policies adopted by SECO on the protection of personal data.

Information regarding conflict minerals status of its suppliers, as well as the results of its internal supplier selection and evaluation process, are reported annually in the SECO's Consolidated Non-Financial Declaration.