



# Conflict Mineral Policy



## Conflict Minerals

In August 2012, the United States Securities and Exchange Commission issued its final rules regarding “Conflict Minerals” as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The four most commonly mined of these minerals are Tantalum, Tin, Tungsten and Gold – collectively known as “3TG”.

In the United States, the Act requires manufacturers to audit their supply chains and report use of conflict minerals. The Act also requires supply chain partners to verify purchased goods as “conflict-free” or implement measures to better manage any inability to do so. As a result of the act, companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the Act.

As a supply chain partner, we are committed to working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support and/or fund conflicts in these regions.

## Our commitments

- We take action to identify which of our products are impacted, and target our efforts accordingly.
- We do not use Conflict Minerals in the manufacturing processes of our own products.
- We require our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to Etra originate from conflict-free sources.
- We contribute to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals.

## Our actions

- As a part of our sourcing strategy, we conduct yearly surveys on our suppliers’ use of Conflict Minerals. Suppliers that report the use of conflict minerals are required provide us with their current CMRT (Conflict Minerals Reporting Template).
- We shall reconsider our willingness to cooperate with suppliers that fail to comply.
- We engage our suppliers to ensure that they respond in a timely manner to our requests to present evidence of compliance.