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| <i>Prepared by</i> | <i>Legal Department</i> |
| <i>Reviewed by / Shared with</i> | <i>Purchasing Manager / SGI Manager - PROCESS QUALITY IMPROVEMENT</i> |
| <i>Approved by</i> | <i>General Director 23/01/2025</i> |

Conflict Minerals Policy

Italian Cable Company S.p.A. (hereinafter "ICC" or "the Company") is committed to promoting responsible sourcing and ensuring that its products do not contain minerals or metals originating from conflict-affected or high-risk areas that could finance human rights violations, armed conflicts, or unethical business practices. Conflict minerals refer to minerals such as tin, tantalum, tungsten, and gold (also known as "3TG") sourced from conflict-affected or high-risk areas, such as the Democratic Republic of the Congo and neighboring countries, where the extraction and trade of these minerals may directly or indirectly finance armed groups or contribute to human rights violations.

1. Reference Regulatory Framework

- Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act;
- Regulation (EU) 2017/821: This European regulation concerns minerals originating from conflict-affected or high-risk areas. It establishes due diligence obligations in the supply chain for Union importers of minerals or metals listed in Annex I, containing tin, tantalum, tungsten, or gold.
- OCSE [Organisation for Economic Co-operation and Development] "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas";
- Extended Minerals Reporting Template (EMRT) of the Responsible Minerals Initiative (RMI): This framework covers a broad range of materials which, while not traditionally classified as "conflict minerals," still require due diligence and transparency measures to prevent the financing of illicit activities and human rights violations;
- Legislative Decree No. 13 of 2 February 2021: This decree implements the delegation granted to the Government to align national legislation with the provisions of Regulation (EU) 2017/821.

Importers in the European Union who do not fall within the scope of Regulation (EU) 2017/821 are not subject to formal due diligence obligations; however, they are encouraged to request compliance documentation from their suppliers to document responsible sourcing.

To support its objectives, applicable rules, and regulations, ICC has decided to adopt this Policy, setting out the principles that the Company is committed to upholding in order to achieve a responsible and sustainable supply chain.

2. ICC's Commitment

ICC implements due diligence measures within its supply chain to identify and mitigate risks associated with minerals and metals originating from conflict-affected or high-risk areas, as well as materials that, while not traditionally classified as "conflict minerals," still require due diligence and transparency practices.

To ensure responsible sourcing and compliance with mineral reporting standards, ICC applies the following due diligence measures to its suppliers:

- Requesting information on the provenance of the supplied materials;
- Where applicable, requesting the completion of the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT) to ensure transparency and traceability of the supplied materials;
- Monitoring suppliers' compliance with responsible sourcing policies;
- Audits and Inspections: Conducting audits and inspections of suppliers to ensure compliance with corporate policies and regulatory requirements;
- Implementation of reporting systems to identify and manage potential risks and/or violations;
- Suspension of supply in the event of non-compliance with corporate policies and termination of the business relationship with the supplier in case of failure to implement corrective measures.

If the Company identifies significant risks within its supply chain, it will promptly implement corrective measures, working with suppliers to ensure responsible management of the supplied materials.

ICC is committed to continuously improving its due diligence practices and updating this policy in line with international regulations and industry best practices.

This policy complements the information provided in other ICC policies and operational procedures, including:

- Code of Ethics;
- Supplier Code of Conduct;
- Whistleblowing Procedure.

This document is approved by the General Director, who, through the Purchasing Managers of both Business Units, the SGI - PROCESS QUALITY IMPROVEMENT Manager, and the Legal Department, periodically reviews it to evaluate its adequacy and identify potential areas for improvement.