

# CONFLICT MINERALS CORPORATE POLICY



RADIALL is deploying its best efforts to follow Section 1502 of the US Dodd-Frank Act regarding Conflict Minerals (Tin, Gold, Tantalum, or Tungsten, the 3TG <sup>[1]</sup>). Radiall's suppliers acquire and use conflict minerals from multiple sources worldwide. As part of Radiall's commitment, it is our goal to use tantalum, tin, tungsten and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC <sup>[2]</sup> or adjoining countries.

RADIALL does not directly source its gold and tin from mines, smelters or refiners. Therefore, RADIALL relies on the information provided by our direct suppliers, which rely themselves upon their own suppliers, direct and indirect. RADIALL's supply chain being highly scalable, a tracking of the 3TG sources Part Number by Part Number is not possible at this stage. Hence RADIALL chose to complete the Conflict Minerals Reporting Template at corporate level (based on the CFSI Standard Smelters List).

In support to this policy, Radiall will:

- Collaborate with our supply chain partners to take reasonable steps to ensure Radiall's compliance with the law and regulations and to strive towards sourcing parts and materials which are considered "3TG conflict free <sup>[3]</sup>".
- If a "3TG conflict free" status cannot be determined by a supplier, supplier agrees to cooperate with Radiall, including disclosing from whom supplier purchased the mineral and urging others to disclose such information, so that the original source of minerals can be accurately determined and reported. If needed, Radiall will execute remediation steps to evaluate and procure, as necessary, alternate parts and materials.
- Expect our suppliers to flow down this policy to their suppliers or establish a conflict minerals policy consistent to Radiall's conflict minerals policy.
- Improve our knowledge of the origin of the 3TG present in our range of products throughout our supply chain to ultimately, supply 3TG product that is "3TG conflict free".

For further questions, please contact Sylvie Lefloch Dubois at [sylvie.lefloch-dubois@radiall.com](mailto:sylvie.lefloch-dubois@radiall.com).

A handwritten signature in black ink, appearing to read "S. Lefloch Dubois", written over a light blue rectangular background.

**S. LEFLOCH DUBOIS**  
*Environmental Compliance*

A handwritten signature in black ink, appearing to read "P. Sivade", written over a light blue rectangular background.

**P. SIVADE**  
*Corporate Quality Manager*

## Notes

1. 3 TG: Tin, Gold, Tantalum, or Tungsten
2. DRC: Democratic Republic of the Congo
3. Conflict free means that the product, or part does not contain conflict minerals that indirectly finance or benefit armed groups as defined SEC Rule 13p-1 under the Securities Exchange Act of 1934

Radiall reserves the right to unilaterally terminate, suspend or amend this policy at any time.