

Electropoli

ELECTROPOLI GROUP CONFLICT MINERALS POLICY

Electropoli Group declares that as a supplier of metal surface treatment solutions, it conducts its business with the utmost respect for business ethics and social responsibility towards all stakeholders. We believe that supporting fundamental human rights is key to building a better future for our company and the communities in which we operate. Our commitment also includes achieving the highest standards of quality, integrity and sustainability.

Standards for Responsible Sourcing of Minerals

Responsible Sourcing Standards are the cornerstone of our approach to raw materials sourcing. We comply with applicable European, international and other regulations, standards and guidelines regarding the use of Conflict Minerals. Our commitments exclude direct involvement in the extraction of minerals from high-risk areas or from areas of conflict. Our supply chain has been structured in a multi-level manner, eliminating direct dependence on mines in conflict and high-risk areas.

We aim to support the sustainable sourcing of minerals, minimize environmental impact and strictly respect human rights. For us, responsible sourcing of minerals is not only an ethical commitment, but also a strategic action that shapes our long-term vision of sustainability.

Conflict Minerals

Cassiterite, columbite-tantalite (coltan), tungsten and gold, as well as their tin derivatives, tantalum and tungsten, referred to as "3TG", form a group of minerals that is commonly known as "conflict minerals". These raw materials are closely linked to armed conflicts and human rights violations on a global scale, especially in areas such as the Democratic Republic of Congo (DRC) and neighboring countries.

Supply Chain Responsibility

Electropoli fully understands that there is a risk of significant negative impacts, such as human rights violations and conflicts, associated with the extraction, trade, transshipment and export of minerals from conflict-affected and high-risk areas. Electropoli Group consistently avoids direct sourcing of minerals from high-risk and conflict areas. It supports the "3TG" validation of mills and refineries by encouraging active participation in the Responsible Minerals Initiative (RMI) process. We strive to ensure that our mineral resources are conflict-free and comply with the highest ethical standards.

Due Diligence

We follow the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We implement a due diligence process and encourage suppliers to cooperate in providing information on the origin and certification of smelters and refineries.

Cooperation with Suppliers

We require our suppliers to respect and comply with existing legal requirements for resource extraction in conflict and high-risk areas (CAHRAs)-as defined by the Dodd-Frank Act and EU regulations. Adherence to OECD due diligence guidelines.

We expect compliance with the Electropoli Supplier Specific Requirements and the Electropoli Group Code of Ethics.


We reserve the right to conduct assessments and audits of suppliers exposed to risk, requiring them to comply with applicable conflict minerals regulations.

Reporting and Transparency

We are committed to maintaining strong supply chain risk management systems, identifying and assessing risks, responding to identified risks and supporting independent mills and refineries' due diligence initiatives.

Electropoli Group is committed to continuous improvement of procedures related to the sourcing of raw materials, including conflict minerals. Our mission is to jointly shape a responsible and sustainable supply chain, as well as actively participate in global initiatives to improve the working and living conditions of mining communities.

Saint Priest, 17/01/2024

A handwritten signature in blue ink, appearing to read 'N.D.', is written over a blue horizontal line.

Nicolas DELAHEGUE
President & CEO