



SITspa

Conflict Minerals Policy

Padova (Italy) February 27th, 2015

Dear Customer,

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law. The Dodd-Frank Act and related U.S. Securities and Exchange Commission rules require certain companies to disclose the extent to which the products they manufacture or contract to manufacture contain so-called conflict minerals sourced from mines in the Democratic Republic of the Congo ("DRC") or adjoining countries. Conflict minerals include tantalum, tin, tungsten and gold.

We, SIT and its subsidiaries, recognize that the issue of conflict minerals originated in the Democratic Republic of the Congo or adjoining countries is one of the significant social issues among supply chains.

We aim at procurement and usage that are free from conflict minerals originated in the Democratic Republic of the Congo or adjoining countries and relating to illegal conduct including human rights infringement.

To realize such procurement and usage, we conduct inquiries of our supply chain in an effort to confirm whether conflict minerals are used.

Based on mutually beneficial relationships, we ask our suppliers to understand our policies and approaches and to promote responsible material procurement.

Based on our inquiry, our goods are DRC conflict undeterminable.

SIT S.p.A.

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