



Conflict Minerals Policy Statement

On August 22nd, 2012 the U.S. Security and Exchange Commission (SEC) published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act governing “Conflict Minerals” (gold, tin, tantalum and tungsten) some of which are potentially derived from minerals obtained from the conflict-affected areas in the DRC.

By 1 January 2021 came into force the new European legislation on minerals from conflict zones, EU Regulation 2017/821 on the Conflict Minerals.

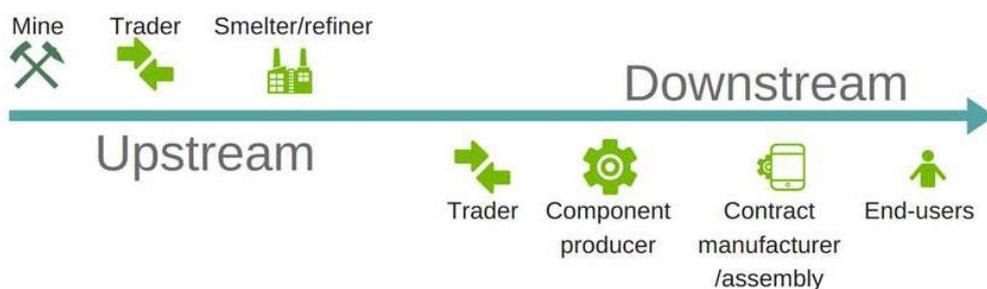
Production of goods involves many different companies engaged in various types of activity along the supply chain.

Firms that extract, process and refine raw materials are called “upstream companies”.

The European regulation identifies as upstream companies: mining companies, raw material traders, smelters and refineries.

Other companies, called “downstream companies”, further process minerals produced during the upstream stage into a finished product. The downstream stage includes the sale of the products to other businesses, governments or private individuals.

The European regulation sets out different rules and different obligations for the companies, due to the different activities



I.C.P. does not directly purchase any raw Conflict Minerals from any source and is many levels far from the mines, smelters and refiners that produce the metals used in the products manufactured by I.C.P.’s suppliers that in many cases are distributors only.



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I.C.P. srl is well aware of the conflict minerals legislation and the proposed disclosure requirements. The fact that I.C.P. maintains an appropriate quality management system is proven by the corresponding certifications according to ISO9001 and IATF 16949.

I.C.P. is committed to have a Conflict Free supply chain and expects that its suppliers have due diligence processes in place to identify the source of the Conflict Minerals contained in their products, and that those sources do not support conflict and violations of human rights.

As part of our comprehensive due diligence:

- we have determined that certain components of the items manufactured (as per customers drawings) Incorporate one or more of the identified "Conflict Minerals"
- we have developed company policy on "Conflict Minerals" and survey that suppliers adopt similar policies and systems.

The survey is carried out to the best of our knowledge and possibility.

Legal Representative
Tancredi Razzano

16 February 2021