


CONFLICT MINERALS RISK ANALYSIS

INDEX OF REVISION AND AMENDMENTS

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1. PURPOSE

The purpose of this RISK ANALYSIS is to analyse the impact of the use of conflict minerals (3TG) on the company JOBS SPA

2. LEGISLATIVE REFERENCES

- Conflict Minerals Provision (US Dodd-Frank Act: Section 1502)
- European Union Regulation 2017/821 on ‘Conflict Minerals’
- OECD Guidance on due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas
- China Chamber of Commerce for Metals Minerals and Chemicals Importers and Exporters (CCCMC)
- Responsible Business Alliance
- Responsible Minerals Initiative
- Public-Private Alliance for Responsible Mineral Trade (PPA)
- EPRM (European Partnership for Responsible Minerals)

3. GENERAL INFORMATION

Conflict minerals are **tin, tungsten, tantalum and gold** (abbreviated as **3TG**), but there is no international standard for identifying conflict minerals based on their origin.

From a legal perspective, the definition covers only the African Great Lakes region (Burundi, the Democratic Republic of the Congo, Ethiopia, Kenya, Malawi, Mozambique, Rwanda, Zambia, Tanzania and Uganda). However, some organisations, such as the EU Regulation, classify ‘3TG minerals’ from any high-risk area as conflict minerals.

‘**DRC conflict-free minerals**’ are defined as 3TG minerals that are mined without directly or indirectly benefiting armed groups in conflict-affected countries, including the Democratic Republic of the Congo (DRC) and neighbouring countries.

4. POLICY

As a rule, JOBS SPA refuses to use any product or raw material that, directly or indirectly, contributes to the financing of such groups.

As part of this commitment, JOBS SPA has adopted a consistent policy aimed at purchasing from responsible and reliable suppliers, taking reasonable steps to understand its supply chains and, where necessary, encouraging suppliers to adopt responsible sourcing practices, as well as refraining from entering into contracts with suppliers who procure from, or are linked to, entities that violate fundamental human rights.

JOBS SPA collects information on its suppliers’ policies regarding the management of conflict minerals.

In addition:

- JOBS SPA requires its suppliers to procure goods and services from socially responsible suppliers.
- JOBS SPA requires its suppliers to comply with the Code of Conduct available on its website.
- JOBS SPA expects its suppliers to comply with the Organisation for Economic Co-operation and Development (OECD) Guidelines on Due Diligence.
- JOBS SPA expects its suppliers to exercise due diligence regarding the origin and chain of custody of these minerals and to provide details of their due diligence measures upon request.
- JOBS SPA expects its suppliers to take measures to reduce risk within their networks by procuring these minerals through ‘Conflict-Free’ supply chains
- JOBS SPA requires its suppliers to ensure compliance with this requirement throughout their supply chains and to verify the origin of the specified minerals.
- Suppliers who do not source from socially responsible suppliers will be subject to review by our Procurement Organisation regarding any future collaboration

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5. CURRENT SITUATION AT JOBS SPA

JOBS SPA considers the issue of 'conflict minerals' to be of great importance for corporate and global sustainability; it pays particular attention to this matter and is committed to ensuring a high level of transparency, within the limits of its capabilities and in collaboration with its suppliers.

Management has analysed JOBS SPA's position on this particular issue.

- JOBS SPA is not an importer of 3TG minerals and metals.
- JOBS SPA does not process or sell 3TG raw materials.
- JOBS SPA does not directly purchase 3TG minerals or their derivatives from smelters or other sources located in conflict zones. For the manufacture of its products, it uses exclusively metals and metal alloys processed in the form of semi-finished products, individual components and modules.
- Nevertheless, 3TG metals form the basis of many electronic components found in the products and components used by JOBS SPA.
- In its products, JOBS SPA uses components sourced primarily from reliable manufacturers and distributors of leading global brands that hold sustainability certifications, with whom it maintains long-term collaborative relationships. These manufacturers issue declarations or certifications regarding the use and origin of the 3TG raw materials present in their supply chains.
- Any suppliers other than those mentioned above are selected primarily from Italian or European markets and, in any case, from outside conflict zones.
- At present, JOBS SPA has no information regarding 3TG minerals from conflict zones that are or have been present in its supply chains or in its products.

In consideration of the above, JOBS SPA considers it highly unlikely that it would be directly or indirectly involved in any legal proceedings, or that it would suffer any reputational damage.

6. ACTIONS

In any case, JOBS SPA implements the following measures:

1. Involvement of all suppliers in this matter through its code of ethics
2. Selection of the most critical suppliers based on product category and purchase volumes
3. Collection of information and certifications via the websites of suppliers/manufacturers of critical components
4. Request and collection of information via questionnaires
5. Formal request for a commitment to company sustainability issues and, in particular, to the issue of 'conflict minerals'.

7. ANNEXES

Questionnaire and letter of commitment

8. FORMS

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