



July 26th, 2022

FOMAS GROUP CONFLICT MINERALS POLICY AND STATEMENT

Dear Customer,

This statement concerns all companies of FOMAS Group (“**FOMAS Group Companies**”) and namely:

- ASFO S.p.A.
- BAY-FORGE PRIVATE LTD.
- FOMAS INC.
- FOMAS PRECISION FORGING (DALIAN) CO. LTD.
- FOMAS S.p.A.
- HOT ROLL S.r.l.
- LA FOULERIE S.A.S.
- MIMETE S.r.l.

Except for MIMETE S.r.l., FOMAS Group Companies do not have primary melting systems in-site and buy raw materials (ingots, bars, etc.) used in manufacturing processes directly from steel mills.

As far as MIMETE S.r.l. is concerned, the company carries out certain in-site alloy making processes as primary melter, through the utilization of materials like ferroalloys, minerals and/or pure metals purchased from responsible supply chain. These processes are strictly functional for MIMETE S.r.l. to perform its business, which involves production and commercialization of metal powders.

FOMAS Group Companies are also private-owned entities, not listed in U.S.A. Stock Exchange. Hence, they are not bound to report with the US Securities and Exchange Commission (SEC) under Section 13(a) or 15(d) of the Exchange Act, because SEC’s Conflict Mineral Rules are not applicable to them.

Nevertheless, FOMAS Group Companies abide anyway to the disclosure principles set forth in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act concerning the origin of “Conflict Minerals¹” and have practices consistent with the SEC’s Conflict Minerals Rule.

To this aim, not only FOMAS Group Companies constantly carry out document-based Reasonable Country of Origin Inquiries on all tiers of respective supply chains, but have also implemented a rigorous conflict minerals sourcing policy, to ensure none of the materials necessary for their production processes is supplied in breach of law provisions on supply of Conflict Minerals (including cobalt and mica) from Conflict Countries².

¹ Term “conflict minerals” includes gold and the three other raw minerals cassiterite, coltan or columbite-tantalite, and wolframite. They are more commonly referred to by the resulting elemental metals gold, tin (cassiterite), tantalum (coltan or columbite-tantalite) and tungsten (wolframite). The requirement also covers their derivatives, or any other materials or their derivatives determined by the Secretary of State to be financing conflict in Conflict Countries.

² At the date of this statement the list of “Conflict Countries” include the Democratic Republic of the Congo and adjoining countries as Angola, Burundi, the Central African Republic, Congo, Rwanda, Sudan/Southern Sudan, Uganda, the United Republic of Tanzania and Zambia.



For such purpose, FOMAS Group Companies ask their suppliers to complete proper *Conflict Minerals Reporting Templates* and *Extended Mineral Reporting Templates*, to confirm that all supplied products originate from non-DRC and/or adjoining countries conflict areas, as well as official confirmations that any Conflict Minerals (including cobalt and mica) in respective supply-chains do not support conflicts.

If a supplier is in breach to the above, FOMAS Group Companies will immediately stop purchasing materials from it.

FOMAS Group Companies also respect OECD, Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. They also comply with the diligence requirements in the supply chain for Union importers of tin, tantalum and tungsten, their ores, and gold, originating in conflict zones or at high risk set forth in Regulation (EU) 2017/821 of the European Parliament and the Council of the European Union of May 19th, 2017.

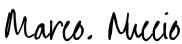
Finally, please understand/note that FOMAS Group Companies have adopted a Code of Ethics founded on respect for human rights, rejecting any form of violence. Indeed, it is of the utmost importance that all customers and suppliers of FOMAS Group Companies share common values and loyalty in term of human rights and reject of any form of armed violence.

Therefore, considering all the above FOMAS Group Companies hereby declare that:

- a) All respective suppliers of raw materials, by means of completing proper *Conflict Minerals Reporting Templates* and *Extended Mineral Reporting Templates*, have declared that, to the best of their knowledge, any material supplied to FOMAS Group Companies do not have origin in Conflict Countries. Documents are available for review at the head office of respective FOMAS Group Company, upon written request;
- b) Based on the results of the enquiries as per letter a), to the best of their knowledge, FOMAS Group Companies have no valid reasons to believe that:
 - (i) any derivate of Conflict Minerals and/or cobalt and/or mica used is originated from Conflict Countries and/or other conflict-affected and high-risk areas as defined in Regulation (EU) 2017/821;
 - (ii) Minerals supplied do not come from scrap or recycled material.

If you have any further questions, please do not hesitate to call your Sales contact or the Quality Department of the FOMAS Group Company involved.

Sincerely,

DocuSigned by:

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Marco Nuccio
 Supply Chain Director - FOMAS Group