

CONFLICT MINERALS POLICY STATEMENT

CLN Group is committed to supporting the humanitarian goal of ensuring peace, development and stability and preventing human rights violations in areas rich in natural resources affected by conflict or at high risk of conflict, such as the Democratic Republic of Congo and neighbouring countries.

In 2012, the US Securities and Exchange Commission ("SEC") established the rules regarding Conflict Minerals, from which metals also known as "3TG" are extracted: Tantalum, Tin, Tungsten and Gold, based on the provisions of art. 1502 of the "Dodd-Frank Wall Street Reform and Consumer Protection Act" of 2010.

The aim of these rules is to discourage the use of minerals whose trade could finance or feed armed groups from conflict zones.

In this regard and in accordance with our mission to improve the responsible procurement, production, use and recycling of steel, which the company also expresses as a member of ResponsibleSteel, CLN Group is committed to:

- Not purchase products and materials that contain "3TG" metals from mines or foundries in a "Conflict Region" or that are not certified as "Conflict Free";
- Ensure compliance and continuous respect of the regulations on Conflict Minerals;
- Request suppliers to comply with these requirements by the transmission of the certification's template referred to on the site http://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/ if they are directly involved with the use of "3TG" metals, or a declaration that such metals or products containing them are not used.

The goal is to ensure that only "Conflict Free" minerals are used in the materials and products purchased, and to direct procurement choices towards suppliers that align with the principles expressed in this statement.

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Gabriele Perris Magnetto

Executive Officer



