

STARPOL II Sp. z o.o.







Starachowice, 02.01.2020

Conflict Minerals' Policy

Conducting all of our business activities with engagement we respect applicable law and ethics. We support the efforts of Human Rights Organizations to end violence and cruelty in Central Africa (Democratic Republic of Congo and neighboring countries).

It is well known that the main reason for this violence is the natural abundance of minerals called "conflict minerals," like:

- -tungsten,
- -tin,
- -gold,
- -tantalum.

Armed groups are fighting for control over the mines in the region, using forced labor to mine and sell minerals, paying for the ongoing conflict.

We support the aim to end violence and violation of human rights in connection with the extraction of gold, tungsten, tin and tantalum. Therefore, we comply with the provisions and guidelines adopted in 2010 by the United States Congress regarding information and public disclosure of the extraction of minerals from regions of the Democratic Republic of the Congo and neighboring countries (DRC), and issued by the US Securities and Exchange Commission (SEC).

In order to eliminate the risk of purchasing components or materials for our production from prohibited sources, and thus fulfill our commitment to ethical business conduct and compliance with regulations on minerals from conflict regions, we have obliged our suppliers to comply with the Code of Business Conduct and to apply supply chain policy consistent with our policy. If irregularities are found, both we and our suppliers are required to change sources of supply to eliminate the origin of minerals from conflict regions in components / materials.

The sources of the conflict are only minerals from smelters that have not been approved as RMAP compliant by an independent third party. Our suppliers are required to provide information on due diligence in the supply chain of conflict minerals via a template (CMRT).

Approved by:

President of the Board

Edward Płusa