



Policy ALT Technologies regarding Conflict Minerals

September 20, 2019

Dear **ALT Technologies** Supplier,

In August 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules regarding “Conflict Minerals*”. These rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals necessary to the functionality or production” of those products that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (“DRC”) and certain other countries in Central Africa. The intent of these requirements is to further the humanitarian goal of ending violent conflict in the DRC and in surrounding countries, which has been partially financed by the exploitation and trade of conflict minerals.

To ensure **ALT Technologies**’ and our customers’ compliance with these requirements, each manufacturer in the supply chain must request information regarding the use of conflict minerals from their direct suppliers who, in turn, must solicit that information from the next tier of suppliers. Therefore, **ALT Technologies** must impose reporting requirements on its global supply chains, regardless of where the components and materials are purchased. We ask that your response to this request cover each of your group subsidiaries and affiliates.

With regards to the Conflict Minerals **ALT Technologies** request:

1. Suppliers of **ALT Technologies** should define, implement and communicate their own policy, outlining their commitment to responsible sourcing of Conflict Minerals, legal compliance and measures for implementation;
2. Supplier shall determine any products containing Conflict Minerals;
3. For the identified products containing Conflict Minerals the suppliers shall conduct a reasonable country of origin inquiry (“RCOI”) to determine if any of the Conflict Minerals came from the DRC or its surrounding countries;
4. If suppliers determine that the supplied products do not contain Conflict Minerals or are not sourced from the DRC or any of its surrounding countries, then suppliers must provide **ALT Technologies** with an assurance that the supplied product does not, to their best knowledge, contain Conflict Minerals and describe the basis for that determination;
5. For all products containing Conflict Minerals and supplied to **ALT Technologies** that are determined to be, or may be sourced from the DRC or any of its surrounding countries suppliers shall conduct due diligence of their supply chains to determine if any of the used Conflict Minerals have directly or indirectly finance or benefit armed groups;

6. If a supplier determines that the supplied products contain any Conflict Minerals, they shall work with sub suppliers to ensure traceability of Conflict Minerals to at least the smelter level and provide the following information to **ALT Technologies** when requested: (i) the smelter(s) used to process the Conflict Mineral found in the supplied product; (ii) the country of origin of these Conflict Minerals; (iii) the due diligence process used to make this determination and (iv) any other information ALT may reasonably request in order to comply with applicable legislation.

Please use the “Conflict Minerals Reporting Template” (CMRT) for reporting your Data to us.

We appreciate your attention to this matter. Please contact “**ALT Technologies Global Purchasing**” with any specific questions you may have on this subject.

Kind Regards,



Jean-Luc Verstraeten

C.E.O. ALT Technologies

* “Conflict minerals” are cassiterite, columbite-tantalite (coltan), gold and wolframite and three derivatives: tin, tantalum and tungsten. The U.S. Secretary of State may identify other minerals to be included in this definition from time to time.