

Conflict Minerals Policy

The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to conflict minerals, as directed by the “Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502” of 2010. The rules require that the manufacturers communicate if their products contain “Conflict Minerals” that are “necessary for the functionality or the production” of those products.

Brahma S.p.A. undertakes:

- not to supply intentionally materials and components containing 3TG metals coming from mines and smelters of the “Conflict Region” that are not certified as “Conflict Free”
- for the purpose of ensuring the conformity to such requisite, to require its own suppliers to undertake a suitable survey with their supply chains in order to guarantee that 3TG metals originate only from:
 - mines and smelters out of the “Conflict Region”
 - mines and smelters certified as “Conflict Free” from an independent third body if located inside the “Conflict Region”

Brahma S.p.A. has obtained, or is about to obtain, information from its suppliers about the origin of the minerals used in the manufacturing of components and products supplied by Brahma S.p.A. The objective is to guarantee that only “Conflict Free” materials and components are used in the products and manufacturing processes. In case we notice that any materials, parts or components purchased by Brahma S.p.A. use minerals extracted or refined in structures which are NOT “Conflict Free”, appropriate actions will be implemented in order for the product to be “Conflict Free.”

Legnago, March 16th, 2021

BRAHMA S.p.A.
Chairman

