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Conflict Minerals Policy

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act, which includes section 1502, a section which regulates disclosure of the use of any "Conflict Minerals". Conflict Minerals refers to minerals and other derivatives mined in the Democratic Republic of the Congo (DRC) and in the adjoining countries, where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. The four minerals covered by the act are Gold (Au), Tantalum (Ta), Tin (Sn) and Tungsten (W) – collectively known as 3TG, all of which can be used in electronic components such as LED Lighting products.

However EFFILUX do not purchase any of the Conflict Minerals directly from smelters, some Minerals can exist in the component we use.

So we have taken measures to eliminate Conflict Minerals from our products by working with our suppliers to gain assurances that none of the 3TG minerals used in our products are derived the DRC Conflict Region. We have further requested our suppliers refuse to use Conflict Minerals from this region in all present and future materials, while also notifying their upstream suppliers of this requirement. Therefore based upon the information provided by our suppliers EFFILUX's components do not knowingly contain minerals derived from the DRC Conflict Region.

Where possible, EFFILUX will incorporate the principles of responsible sourcing of Conflict Minerals into our contract terms with suppliers and will work with our suppliers to create awareness of these issues within our supply base. We will make our position statement available to our suppliers and expect them to adopt similar positions or policies with respect to their own supply chains.

EFFILUX encourages its suppliers that manufacture components, parts, or products containing Conflict Minerals to procure those materials from conflict-free sources. We expect our suppliers to adopt, implement and communicate to sub-suppliers their positions and policies regarding Conflict Minerals, and where possible, require their down-stream suppliers to adopt and implement similar positions and policies. EFFILUX's suppliers are expected to work with sub-suppliers to trace conflict materials at least to the smelter level and encourage the use of a standard reporting process (e.g. the Conflict Minerals Reporting Template).

Inquiries relating to Conflict Minerals can be directed to contact@effilux.fr

Executed at Les Ulis,
30/03/2020

