

Policy on Conflict Minerals

Current as of 27.3.2017

Background

In August 2012, the United States Securities and Exchange Commission (“SEC”) issued its final rules regarding “Conflict Minerals” (known as ‘3TG’ – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the Act.

ETRA’s commitments

We are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries. Therefore we are committed to:

- identifying which ETRA products are impacted and targeting our efforts accordingly
- not buying products and materials containing Conflict Minerals directly from Conflict Mines
- asking our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to ETRA originate from Conflict Free sources
- contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals

ETRA’s measures

- requiring our suppliers to complete ETRA Oy Supplier Survey which includes Conflict Minerals section
- engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance
- ETRA will reconsider our willingness to partner with suppliers that fail to comply with this Policy