


ID	DGMM-33448	
Version	1	
Date	1.11.2017	
Drafted by	Reviewed by	Approved by
Teppo Pitkänen	Jari Aspegren	Kai Orpo 

Policy for Conflict Minerals

Darekon Oy Ltd is committed to the highest standards of social, ethical, and environmental conduct. We expect the suppliers we do business with to share our commitment.

Part of Darekon's commitment to these high standards includes minimizing the use of conflict minerals that finance or benefit armed groups. In certain countries, the extraction of conflict minerals has financed armed groups engaged in civil war, resulting in serious social and environmental abuses. In July 2010, the US Congress passed legislation requiring the US Securities and Exchange Commission (SEC) to adopt rules that all US publicly traded companies must disclose their use of conflict minerals.

The SEC defines "conflict minerals" as

- cassiterite, which is refined into tin
- columbite-tantalite, which is refined into tantalum
- wolframite, which is refined into tungsten
- gold
- or any other minerals or their derivatives determined by the US Secretary of State to be financing conflict in the Democratic Republic of the Congo (DRC) or adjoining countries (covered countries).

Darekon Oy Ltd does not directly purchase or source the raw metals used in our products. For this reason, tracing the path of minerals throughout our supply chain is a complex process. We also do not have complete visibility into the sources of all component minerals. However, we actively engage with our suppliers to promote responsible sourcing practices, and we conduct due diligence that is aligned with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to determine whether the materials provided by our suppliers contain conflict minerals mined from the covered countries.

By "responsible sourcing practices," we mean that Darekon suppliers should conduct their own due diligence to determine (1) whether the products they supply to Darekon contain these minerals, (2) whether these minerals are sourced from the covered countries, and (3) whether their sources of these minerals finance or benefit armed groups in the covered countries. Darekon suppliers have to avoid sources that benefit armed groups and have to seek conflict-free sources for these materials. Our suppliers may take some or all of the following actions to establish their compliance with the SEC rule:

- 1. Publish a corporate policy that addresses compliance with conflict mineral regulations**
- 2. Work with suppliers within their own supply chain to determine the source or country of origin for the specified minerals**
- 3. Provide Darekon the necessary declarations and information needed to demonstrate their own due diligence**
- 4. Procure materials from socially responsible suppliers**

Suppliers who report the use of conflict minerals that benefit armed groups or suppliers that fail to provide information about the source of these materials shall provide a statement to Darekon to explain why they have not met these requirements. Darekon's Supply Chain Director will review these statements to determine whether Darekon will continue to purchase from these noncompliant suppliers.

Managing Director Kai Orpo

Supply Chain Director Teppo Pitkänen