

LEONIX FASTENERS SRL

P.IVA/C.FISC: 03534600162

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DECLARATION OF CONFORMITY WITH “CONFLICT MINERALS” REGULATIONS

1. Reference Regulations

U.S. Regulation

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) issued rules concerning Conflict Minerals (CM), from which the metals known as “3T+G” (tantalum, tin, tungsten, and gold) are derived, based on Section 1502 of the “Dodd-Frank Wall Street Reform and Consumer Protection Act” of 2010.

EU Regulation

Regulation (EU) 2017/821 establishes due diligence obligations in the supply chain for European Union importers of tin, tantalum, and tungsten, their ores, and gold originating from conflict-affected or high-risk areas. These obligations have been in effect since January 2021.

2. Raw Material and Production Process Assessment

All items we manufacture using special steels do not contain the metals tin, tantalum, tungsten, or gold—commonly referred to as “3T+G” metals. The processing phases of the steel, including any treatments or coatings, do not involve the intentional addition of 3T+G metals. Any trace amounts that may be present in the final product are unintentional.

3. Declaration of Conformity

Based on the above, we declare that the items produced and marketed by LEONIX FASTENERS S.r.l. comply with Regulation (EU) 2017/821 (Conflict Minerals) and Section 1502 of the U.S. “Dodd-Frank Wall Street Reform and Consumer Protection Act” regarding Conflict Minerals.

4. Updates

Any changes in the information we possess regarding raw materials, the production cycle, or applicable regulations will be carefully evaluated to ensure our continued compliance with the relevant legislation.

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DATE: 08/05/2025

SIGNATURE:



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