

SPAL AUTOMOTIVE S.r.l is committed to conducting its business in an ethical and sustainable manner and applies its high standards of ethical conduct and compliance with applicable laws in procurement practices.

The Securities and Exchange Commission (“SEC”) adopted annual disclosure requirements in connection with the conflict minerals provision of the Dodd-Frank Wall Street Reform and Consumer Protection Act. This requires disclosing whether certain minerals, necessary to the functionality or production of products manufactured or contracted to be manufactured, originated in the Democratic Republic of Congo and its nine neighboring countries (the “DRC”). These certain minerals referred to as “conflict minerals” include tantalum (columbite-tantalite), tin (cassiterite), tungsten (wolframite) and gold (“3TGs”).

SPAL Automotive S.r.l. requires having a conflict free supply chain and works with its suppliers to increase transparency regarding the origin of minerals contained in its products.

SPAL Automotive S.r.l. expect its suppliers to adopt policies and management systems with respect to conflict minerals and requires their suppliers to adopt similar policies and systems.

Compliance to these requirements will be taken into consideration when selecting and retaining suppliers.

SPAL Automotive S.r.l