

Conflict Minerals Policy

"Conflict Minerals" refers to minerals or other derivatives mined in the eastern provinces of 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. In July 2010, the United States passes HR4173, the Dodd-Frank Financial Reform Bill section 1502(b) requiring all US stock listed companies and their suppliers to disclose the chain of custody usage of conflict minerals (Tin, Tantalum, Tungsten, and Gold . . . 3TG).

Gefran fully supports the goals and objectives of Section 1502 ("Section 1502") of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act").

Gefran is committed to avoiding the use of Conflict Minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Gefran is committed to complying with the reporting obligations required under Section 1502 of the Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission, including the requirement that Gefran conduct inquiries into the source of any Conflict Minerals included in its products.

Gefran also intends to adopt the Electronic Industry Citizenship Coalition Due Diligence reporting process and obtain chain of custody declarations from suppliers to ensure transparency and corporate social responsibility throughout the supply chain.

Gefran suppliers are required to acknowledge requirements regarding Conflict Minerals and responsible sourcing. Suppliers are also responsible for passing the same requirements on to their suppliers.

Suppliers will be required to declare that all products supplied either:

1. Do not contain tantalum, tin, tungsten or gold that are necessary to their production or functionality, or,
2. If they do contain these minerals, that they originate from non-conflict areas or from smelters that have been validated by an independent private sector party to be conflict free.

Gefran will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. Gefran reserves the right to request additional documentation from its suppliers regarding the source of any Conflict Minerals included in its products. In addition, suppliers must maintain and provide to Gefran upon request traceability data for a minimum of five years.

Suppliers who do not comply with these requirements shall be reviewed by Gefran's supply chain organization for future business.

06 May 2013

Quality Manager

E. Maffi



Chief Executive Officer

A. Sala



Gefran spa

Via Sebina, 74
25050 Provaglio d'Iseo
(BS)
Italy

Tel. +39 030 9888.1
Fax +39 030 9839063
www.gefran.com
info@gefran.com

Cap. Soc. € 14.400.000 i.v.
Reg. Imprese Brescia
03032420170
R.E.A. 313074 BS

N. Mecc. BS 016227
C.F. 03032420170
P.IVA (TVA-VAT-
MWS)
IT03032420170

