

Beneq Products Oy (“Beneq”) Conflict Minerals Policy

1. Introduction

There has been increased awareness of violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern part of the Democratic Republic of the Congo (DRC) and surrounding countries. The definition of “Conflict Minerals” currently refers to gold, tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite.

On August 22, 2012, the final rule regarding sourcing of Conflict Minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”) was approved by the U.S. Securities and Exchange Commission (“SEC”). The rule imposes reporting requirements on publicly traded companies subject to the SEC to report annually the presence of conflict minerals originating from the Conflict Region in the products they manufacture or contract to manufacture whereby the Conflict Minerals are necessary to the functionality or production of a product.

The joint Electronic Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) is taking action to address responsible sourcing e.g. through the development of the Conflict Free Smelter (CFS) program aiming to enable companies to source conflict-free minerals.

Companies around the globe have been requested to practice reasonable due diligence with their supply chain to assure that Conflict Minerals are not being sourced from mines in the Conflict Region in order to prevent financing to non-government military groups, or unlawful military factions.

2. What is Beneq doing?

Beneq supports the aims and objectives of the U.S. legislation and the EICC and GeSI initiative and our aim is to ensure that only “conflict free” materials and components are used in products that we procure.

Tracing materials back to their mine of origin is however a complex aspect of responsible sourcing. Beneq is currently surveying suppliers in our supply chain to understand what programs they have in place to track the source of minerals used in the products they manufacture and establishing an appropriate due diligence process.

3. Beneq’s expectations from its suppliers

Beneq expects its suppliers to

- i) commit to the EICC Code of Conduct which includes a provision related to the responsible sourcing of minerals.
- ii) have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture are conflict free
- iii) establish their own due diligence program to ensure conflict-free supply chains.

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- iv) ensure that the specified metals are sourced either from mines and smelters outside Conflict Region or from certified conflict-free smelters validated as compliant to the EICC Conflict Free Smelter (CFS) protocol, using the CFS Compliant Smelter List.
- v) provide written documentation of raw material sources using the EICC-GeSI Conflict Minerals reporting template when applicable.

Beneq empowers all employees, suppliers, vendors, contractors and other stakeholders to take ownership in supporting our goal of ensuring that only “conflict free” materials and components are used in products that we procure. Stakeholders are encouraged to inform Beneq’s management if use of Conflict Minerals is discovered.

Espoo, 22 April 2013



Hanna Lilja
Manager, Quality
Beneq