



Policy on Conflict Materials

In compliance with Section 1502 of the **Dodd–Frank Wall Street Reform and Consumer Protection Act**, which passed Congress and was signed into United States of America law on July 21, 2010, Ito Group has implemented the following policy on the use of natural materials coming from the Democratic Republic of Congo or other areas where natural resource extraction fails to support human rights and environmental standards as laid out by the United Nations' Declaration on Human Rights, the ILO Core Conventions on Labor Standards, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, or similar bodies.

Many products sold by Ito Group contain none of the minerals or mineral derivatives affected by this legislation, but for those products containing such materials, Ito Group has enacted the following procedures and standards to assure that no conflict minerals are used at any point in our supply chain.

1. Education. Ito Group will assure that suppliers are aware of the legal requirements and ethical implications of using materials that may be sourced in or near a conflict zone.
2. Documentation: Ito Group will obtain certification that suppliers selling us products containing tin, tantalum, tungsten, or gold are obtaining these minerals from foundries that have a comprehensive conflict mineral policy that prohibits them from sourcing from a conflict zone.
3. Publication. Ito Group will post this Policy on Conflict Minerals on its website and will make a copy of the Policy available for any supplier or customer who wishes to obtain it.

This policy was enacted as of July 22, 2013 and updated on April 24, 2020.

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