



**Emergency Lighting Equipment  
Service Company (ELESCO)  
Policy on Conflict Minerals**  
Effective November 1, 2023



## **Background**

In August 2012, the United States Securities and Exchange Commission (“SEC”) issued its final rules regarding “Conflict Minerals” (known as ‘3TG’s’ – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd – Frank Wall Street Reform and Consumer Protection Act (the “Act”). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining or covered countries named in the Act.

ELESCO strives to be a good corporate citizen. We are committed to ensuring the health, safety and protection of people who meet our products and business, and we require high social, environmental, and human rights standards among our suppliers. Managing our obligations in relation to Conflict Minerals is a part of this corporate responsibility. ELESCO is proactively supporting development and governance in that region and is contributing financially to international humanitarian aid efforts.

## **ELESCO Commitments**

We are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo and the adjoining or covered countries. Therefore, we are committed to:

- Identifying which ELESCO products are impacted and targeting our efforts appropriately.
- Identifying materials and not buying products and materials containing Conflict Minerals directly from Conflict Mines
- Asking our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to ELESCO originate from Conflict Free Sources
- Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals

In addition, we are committed to engaging with our customers regarding their disclosure obligations.



## **ELESCO Measurements**

In working towards these commitments, we have taken several steps that include:

- Establishing a “Conflict Minerals Compliance Program” supported and sponsored by ELESCO Executive Committee to review the use of Conflict Minerals in our products and to be able to fulfill our reporting obligations and respond to customer inquiries. This program was developed based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and other appropriate international standards.
- Requiring our suppliers to implement a policy regarding Conflict Minerals and exercise due diligence to investigate the source of these minerals
- Engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. In the future, our suppliers’ willingness to comply with this initiative will be a factor in our sourcing decisions
- Updating the ELESCO Supplier Code of Conduct and our purchasing terms and conditions to reflect this policy.