

Conflict Minerals Policy

Background

Tin, tantalum, tungsten, and gold are commonly referred to as "conflict minerals" regardless of their country of origin. As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the U.S. Securities & Exchange Commission ("SEC") has adopted a rule to bring greater supply chain transparency to the use of conflict minerals originating from the Democratic Republic of the Congo and surrounding countries. The SEC's Conflict Minerals Rule requires SEC registrants who manufacture or contract to manufacture products containing conflict minerals that are necessary to such products' functionality or production to disclose the origin and status of the conflict minerals.

Policy Statement

Hydra a.s., together with its subsidiaries, is committed to corporate responsibility and to respecting human rights in its own operations and in its supply chain. Hydra a.s. is committed to complying with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, as well as the SEC's Conflict Minerals Disclosure Rule. As part of that commitment, Hydra a.s. will seek to identify, reduce, and ultimately eliminate the use in its products of conflict minerals that directly or indirectly finance, or benefit armed groups in the Democratic Republic of the Congo and surrounding countries.

The company Hydra a.s. uses one of the conflict minerals (tin) in the production, and for this reason, has adopted this Policy.

Hydra a.s. requires its suppliers to fulfil all requirements resulting from the above-mentioned regulations or laws and requires that the applicable suppliers of products containing conflict minerals meet the following:

- commit to identifying and eliminating the use in materials supplied to Hydra a.s. of conflict minerals that directly or indirectly finance, or benefit armed groups in the Democratic Republic of the Congo and surrounding countries;

- work with their own upstream suppliers and supply chain to determine the source and chain of custody of any products containing conflict minerals supplied to Hydra a.s.;
- establish their own policies, due diligence frameworks and management systems for the traceability of conflict and cooperate with Hydra a.s. in its efforts to comply with any applicable reporting requirements (including without limitation the SEC Conflict Minerals Disclosure Rule).

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