
Conflict Minerals Policy

Ouneva Group (Alsiva Oy, Eswire Oü, Jotwire Oy, Ouneva Oy, Valukumpu Oy) is committed to sourcing components and materials from companies that share our values of human rights, ethics and environmental responsibility.

We expect all of our suppliers to abide by the requirements of our Supplier Code of Conduct, which prohibits human rights abuses and unethical practices. We also require all of our suppliers to comply with the applicable legal standards and requirements.

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final conflict minerals rule under Section 1502 the Dodd - Frank Wall Street Reform and Consumer Protection Act (The “Conflict Minerals Rule”). The Conflict Minerals Rule requires publicly traded companies to report annually the presence of conflict minerals (Tin, tungsten, tantalum and gold, or “3TG”) originating in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”).

Ouneva Group supports the goal of ending violence, human rights violations and environmental devastation in the Covered Countries. We are committed to comply with any requirements applicable to our Company under the Conflict Minerals Rule.

Ouneva Group requires all of our suppliers to provide us with completed conflict minerals declarations using the EICC/GeSI Conflict Minerals Reporting Template. We reconsider our willingness to partner with suppliers that fail to comply with this Policy.

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Keijo Kurki, CEO