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Conflict Minerals Reporting Template (CMRT)

English

Revision 5.11
 April 27, 2018

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	TRAFILERIE DI VALGREGHENTINO SPA	
Declaration Scope or Class (*):	A. Company	
Description of Scope:	CARBON STEEL WIRES MANUFACTURING	
Company Unique ID:	IT 00210700134	
Company Unique ID Authority:	EORI	
Address:	via Fratelli Kennedy, 66 Valgrehentino 23857 Italia	
Contact Name (*):	Zanbroni Alberto	
Email - Contact (*):	aualty@traval.it	
Phone - Contact (*):	+39 0341 604504	
Authorizer (*):	dott. ing. Luigi Sabadini	
Title - Authorizer:	C.E.O.	
Email - Authorizer (*):	management@traval.it	
Phone - Authorizer (*):	+39 0341 604504	
Effective Date (*):	13-Mar-2019	

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum	NO	Undesirable
Tin	NO	Undesirable
Gold	NO	Undesirable
Tungsten	NO	Undesirable

2) Does any 3TG remain in the product(s)?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

5) What percentage of relevant suppliers have provided a response to your supply chain survey?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

6) Have you identified all of the smelters supplying the 3TG to your supply chain?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

7) Has all applicable smelter information received by your company been reported in this declaration?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy?	NO	not applicable
B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.)	NO	not applicable
C. Do you require your direct suppliers to be DRC conflict-free?	NO	not applicable
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?	NO	not applicable
E. Have you implemented due diligence measures for conflict-free sourcing?	NO	not applicable
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?	NO	not applicable
G. Do you review due diligence information received from your suppliers against your company's expectations?	NO	not applicable
H. Does your review process include corrective action management?	NO	not applicable
I. Is your company required to file an annual conflict minerals disclosure with the SEC?	NO	