

## **Conflict Minerals Reporting Template (CMRT)**

Select Language Preference Here: 请选择你的语言: 사용할 언어를 선택하시오 :

PALS - INITIA	表示言語をここから選択してください: Sélectionner la langue préférée ici:	English					
JS. 11/1,	Selecione Preferência de idioma Aqui:  Wählen sie hier die Sprache:	anguan					
	Seleccione el lenguaje de preferencia aqui: Selezionare la lingua di preferenza qui:				Paralleles C O4		
	Burada Dil Tercihini Belirleyin:				Revision 6.01 May 19, 2020		
The purpose of	The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products <u>Link to Terms &amp; Conditions</u>						
Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.							
-		Company Informati					
	Company Name (*): Declaration Scope or Class (*):	VIRMA BULGARIA E A. Company	OOD (is a company	subject to VIRMA spa's management and coordin	ation activity)		
		Product of small me	tal nart				
	Description of Scope:	roduce of sman me	tai pai t				
	Company Unique ID:	VAT ID # BG202029	629				
	Company Unique ID Authority: Address:	DUNS RADINOVO INDUST	RIAL FSTATE - 4202	RADINOVO - BULGARIA			
	Contact Name (*):	Mrs. ZORNITSA GER					
	Email - Contact (*): Phone - Contact (*):	+359893668115	info@virmagroup.com.				
	Authorizer (*):	Eraldo Agostini					
	Title - Authorizer:	President					
	Email - Authorizer (*):	eraldo.agostini@virmagrou	o.com				
	Phone - Authorizer: Effective Date (*):	NA 14-0c	2020				
	Enceuve Bace ( ).	14-00	1-2020				
	Answer the following question	is 1 - 8 based on the d	eclaration scope in	dicated above			
1) Is any 3TG intentionally added or used in	the product(s) or in the production process? (*)	Answer		Comments			
	Tantalum	No		Tin is present on our part from surface treatment coating	g of raw material or surface treatment		
	Tin (*)	Yes		coating after the production process.			
	Gold	No No					
	Tungsten	NO					
	_			_			
2) Does any 3TG remain in the product(s)? (*	*) Tantalum	Answer		Comments			
	Tin (*)	Yes		Tin is present on our part from surface treatment coating	g of raw material or surface treatment		
	Gold	100		coating after the production process.			
	Tungsten						
	rungsten						
22 Parameter and the second sec	2 (576						
term, see definitions tab) (*)	in source the 3TG from the covered countries? (SEC	Answer		Comments			
	Tantalum						
	Tin (*)	No					
	Gold						
	Tungsten						
	in source the 3TG from conflict-affected and high-						
risk areas? (*)	Tantalum	Answer		Comments			
	Tin (*)	No		-			
	Gold						
	Tungsten						
<u> </u>	9						
5) Does 100 percent of the 3TG (necessary to originate from recycled or scrap sources? (*	o the functionality or production of your products)	Answer		Comments			
, seyesca or scrap sources: (	Tantalum						
	Tin (*)	No					
-	Gold						
	Tungsten						
6) What percentage of relevant suppliers have	ve provided a response to your supply chain						
survey? (*)	, and a part of the supply comm						
	m	Answer		Comments			
	Tantalum Tin (*)	100%					
	Gold	20070					
	Tungsten						
1	Lungsten			. L			
7) Have you identified all of the smelters sup	onlying the 3TG to your supply chain? (*)						
., 2 you meanined an or the smellers sup		Answer		Comments			
	Tantalum						
	Tin (*)	Yes					
	Gold						
	Tungsten						



#### **Conflict Minerals Reporting Template (CMRT)**

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

) Has all applicable smelter information received by your company been reported in this		
adaration? (*)	A	Commonte

Tin (*)	Yes	
Gold		
Tungsten		
Answer the Fo	llowing Questions at a Company Level	
Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	Process of audit to our supplier with certification and technical specification request.
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	Yes	https://www.virmagroup.com/it/azienda
C. 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? (*)	Yes	
D. Have you implemented due diligence measures for responsible sourcing? (*)	No	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	No	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	No	
G. Does your review process include corrective action management? (*)	No	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	



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English		

ALS. INIT	Sélectionner la langue préférée ici: Selecione Preferência de idioma Aqui:	English			
	Wählen sie hier die Sprache: Seleccione el lenguaje de preferencia aqui:				
	Selezionare la lingua di preferenza qui: Burada Dil Tercihini Belirleyin:				Revision 5.12 April 26, 2019
The purpose of	f this document is to collect sourcing information on	tin, tantalum, tungs	ten and gold used in	products	Link to Terms & Conditions
	Mandatory fields are noted with an asterisk (*). Co		_	on how to answer each question.	
	Company Name (*):	Virma Group Spa	on		
	Declaration Scope or Class (*):	A. Company			
		Product of small me	tal part		
	Description of Scope:	r roduct of small me	tai pai t		
	Company Unique ID:	Cod. Fisc. 05870580	965		
	Company Unique ID Authority:	DNS 33-928-2956	700		
	Address:		nestieri 14, Sulbiate, 2	20884, Italia	
	Contact Name (*): Email - Contact (*):	Giorgio Parolini	o com		
	Phone - Contact (*):	+39 3351407402			
	Authorizer (*):	Eraldo Agostini			
	Title - Authorizer:	President			
	Email - Authorizer (*):	eraldo.agostini@virmagrou	o.com		
	Phone - Authorizer (*):	NA			
	Effective Date (*):	6-Nov	-2019		
	Answer the following questions	s 1 - 7 based on the	eclaration scope in	dicated above	
1) Is any 3TG intentionally added or used in	the product(s) or in the production process? (*)	Answer		Comments	
	Tantalum	No			
	Tin (*)	Yes			
	Gold	No			
	Tungsten	No			
-					
2) Does any 3TG remain in the product(s)? (		Answer		Comments	
	Tantalum				
	Tin (*)	Yes			
	Gold				
	Tungsten				
3) Do any of the smelters in your supply chai	in source the 3TG from the covered countries? (SEC				
term, see definitions tab) (*)		Answer		Comments	
	Tantalum				
	Tin (*)	No			
	Gold				
	Tungsten				
4) Does 100 percent of the 3TG (necessary to originate from recycled or scrap sources? (*	o the functionality or production of your products)	Answer		Comments	
g or sorup sources. (	Tantalum				
	Tin (*)	No			
	Gold				
	Tungsten				
5) What percentage of relevant suppliers have	ve provided a response to your supply chain				
survey? (*)	* Ann ankkin				
		Answer		Comments	
	Tantalum				
	Tin (*)	100%			
	Gold				
	Tungsten				
L					
0.11	and the state of t				
6) Have you identified all of the smelters sup	pplying the 3TG to your supply chain? (*)	Answer		Comments	
	Tantalum				
	Tin (*)	Yes			
	Gold				
	dolu			<u> </u>	



# Select Language Preference Here: 濟选择你的语言: 사용할 언어를 선택하시오:

# **Conflict Minerals Reporting Template (CMRT)**

Answer Comments    Comments   Comments   Comments   Comments	発音型は多いでは、 最大書籍をこまた3番以てて発さい。 Sélectionner la langue préférée icit Selectione Preferência de idioma Aqui Wählen sie hier die Sprache: Selectione el lenquai de preferencia aqui: Selezionare la lingua di preferenca qui: Burado Dil Terchini Belirleyin: The purpose of this document is to collect sourcing information or	_	_		Revision 5.12 April 26, 2019 <u>Link to Terms &amp; Conditions</u>
Tin (*) Gold Tungsten  Answer the Following Questions at a Company Level  Answer Test Comments  Question Answer Test Comments  Answer Test Comments  Yes Process of addit to our supplier with certification request  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.) (*)  C. Do you require your direct suppliers to be DRC conflict-free? (*)  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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  No  O. Do you require with ediligence information received from your suppliers against your company's  No  O. Do you review due diligence information received from your suppliers against your company's  No	7) Has all applicable smelter information received by your company been reported in this		s tab for guidance (		
Gold Tungsten  Answer the Following Questions at a Company Level  Question Answer Answer Answer  Answer  Answer  Answer  Yes  B. Is your conflict minerals sourcing policy? (*)  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.) (*)  Yes  D. Do you require your direct suppliers to be DRC conflict-free? (*)  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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant suppliers (s)? (*)  No  O. Do you review due diligence information received from your suppliers against your company's					
Answer the Following Questions at a Company Level  Question Answer Answer Yes  Comments Process of audit to our supplier with certification request  R. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)  C. Do you require your direct suppliers to be DRC conflict-free? (*)  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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  G. Do you review due diligence information received from your suppliers against your company's  No		Yes			
Answer the Following Questions at a Company Level  Question A. Have you established a conflict minerals sourcing policy? (*)  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.) (*)  C. Do you require your direct suppliers to be DRC conflict-free? (*)  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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  No  G. Do you review due diligence information received from your suppliers against your company's	22.1				
A. Have you established a conflict minerals sourcing policy? (*)  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.) (*)  C. Do you require your direct suppliers to be DRC conflict-free? (*)  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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant suppliers (s)? (*)  No  G. Do you review due diligence information received from your suppliers against your company's	Lungsten				
A. Have you established a conflict minerals sourcing policy? (*)  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.) (*)  C. Do you require your direct suppliers to be DRC conflict-free? (*)  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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant suppliers (s)? (*)  No  G. Do you review due diligence information received from your suppliers against your company's			Company Level	Comments	
shall specify the URL in the comment field.) (*)  C. Do you require your direct suppliers to be DRC conflict-free? (*)  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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  No  G. Do you review due diligence information received from your suppliers against your company's					
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? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  G. Do you review due diligence information received from your suppliers against your company's		Yes		www	
practices have been validated by an independent third party audit program? (*)  E. Have you implemented due diligence measures for conflict-free sourcing? (*)  F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  G. Do you review due diligence information received from your suppliers against your company's	C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes			
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  No  G. Do you review due diligence information received from your suppliers against your company's		No			
G. Do you review due diligence information received from your suppliers against your company's	E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes			
	F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	No			
		No			
H. Does your review process include corrective action management? (*)	H. Does your review process include corrective action management? (*)	No			
L Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	L Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No			
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