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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.01
 May 19, 2020

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 (*):	VIRMA BULGARIA EOOD (is a company subject to VIRMA spa's management and coordination activity)
Declaration Scope or Class (*):	A. Company
Description of Scope:	Product of small metal part
Company Unique ID:	VAT ID # BG202029629
Company Unique ID Authority:	DUNS
Address:	RADINOVO INDUSTRIAL ESTATE - 4202 RADINOVO - BULGARIA
Contact Name (*):	Mrs. ZORNITSA GEROVA
Email - Contact (*):	bulgeria@virmagroup.com - info@virmagroup.com
Phone - Contact (*):	+359893668115
Authorizer (*):	Eraldo Agostini
Title - Authorizer:	President
Email - Authorizer (*):	eraldo.agostini@virmagroup.com
Phone - Authorizer:	NA
Effective Date (*):	14-Oct-2020

Answer the following questions 1 - 8 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	
Tin (*)	Yes	Tin is present on our part from surface treatment coating of raw material or surface treatment coating after the production process.
Gold	No	
Tungsten	No	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum		
Tin (*)	Yes	Tin is present on our part from surface treatment coating of raw material or surface treatment coating after the production process.
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 (*)	No	
Gold		
Tungsten		

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum		
Tin (*)	No	
Gold		
Tungsten		

5) 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 (*)	No	
Gold		
Tungsten		

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin (*)	100%	
Gold		
Tungsten		

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



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

8) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin (*)	Yes	
Gold		
Tungsten		

Answer the Following 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

Revision 5.12
April 26, 2019

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

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

Company Information

Company Name (*):	Virma Group Spa
Declaration Scope or Class (*):	A. Company
Description of Scope:	Product of small metal part
Company Unique ID:	Cod. Fisc. 05870580965
Company Unique ID Authority:	DNS 33-928-2956
Address:	Via delle arti e dei mestieri 14, Sulbiate, 20884, Italia
Contact Name (*):	Giorgio Parolini
Email - Contact (*):	giorgio.parolini@virmagroup.com
Phone - Contact (*):	+39 3351407402
Authorizer (*):	Eraldo Agostini
Title - Authorizer:	President
Email - Authorizer (*):	eraldo.agostini@virmagroup.com
Phone - Authorizer (*):	NA
Effective Date (*):	6-Nov-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	
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 chain 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 the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum		
Tin (*)	No	
Gold		
Tungsten		

5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin (*)	100%	
Gold		
Tungsten		

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



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7) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin (*)	Yes	
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy? (*)	Yes	Process of audit 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.) (*)	Yes	www
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	
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	
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	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	No	
H. Does your review process include corrective action management? (*)	No	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	