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Conflict Minerals Reporting Template (CMRT)

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

[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 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 | |