GHIDINI TRAFILERIE

Conflict Minerals (DFA) Statement and Policy

On 21st July 2010 the United States approved the Dodd-Frank Wall-Street Reform and Consumer Protection Act. Article 1502 of this law regulates the trade in Conflict Minerals, stating that every company present in the American market is required to notify the Securities and Exchange Commission (SEC) if the materials used in its products are derived from the Democratic Republic of Congo (DRC) and neighbouring countries.

On 22nd August 2012, the United States Securities and Exchange Commission confirmed the adoption of the definitive rules relating to Conflict Minerals, putting them into effect from 1st January 2013.

The standard was implemented at European level with the EU Regulation 821/2017 with application obligation from 1^{st} January 2021.

The materials affected by the regulation (3TG) are: tin, tungsten, tantalum and gold; in the products of Ghidini Trafilerie there is tin in percentages lower than 0.3% coming from recycled material (not added intentionally).

Ghidini Trafilerie does not import, market or process such materials, but declares in any case that it shares and supports the anti-conflict policy.

Lumezzane, 15/10/2021

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