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Conflict Minerals Reporting Template (CMRT)

Revision 6.4
 April 26, 2024

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 (*):	F.I.L.M.S. S.P.A. (Fabbrica Italiana Leghe Metalliche Sinterizzate)
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	IT00116980038
Company Unique ID Authority:	Registro Impresa Monte Rosa Laghi Alto Piemonte
Address:	Via Megolo, 43 - 28877 Anzola d'Ossola (VB) Italy
Contact Name (*):	Dominique Wszelaki
Email - Contact (*):	D.WSZELAKI@UFFICIA.IT
Phone - Contact (*):	+390323062044
Authorizer (*):	Alberto Tedeschi
Title - Authorizer:	
Email - Authorizer (*):	duediligence@omcd.it
Phone - Authorizer:	
Effective Date (*):	13-Jun-2024

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 (*)	Yes	
Tin (*)	Yes	
Gold	No	
Tungsten (*)	Yes	main raw material

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	main raw material

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 (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	We source exclusively Conflict-Free material from RMI certified smelters according to the requirements of the OECD Due Diligence Guideline, EU Conflict Minerals Regulation, and Dodd-Frank Act. Our smelters are fully covered by the RMAP audits or third party audit.

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	We source exclusively Conflict-Free material from RMI certified smelters according to the requirements of the OECD Due Diligence Guideline, EU Conflict Minerals Regulation, and Dodd-Frank Act. Our smelters are fully covered by the RMAP audits or third party audit.

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 (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	No	

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



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7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)

	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	

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

	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	
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.orned.it/sustainability/
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? (*)	Yes	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., 4	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
G. Does your review process include corrective action management? (*)	Yes	When we identify a reasonable risk that a supplier is sourcing from, or linked to, a party committing serious abuses as set forth in the Responsible Supply Chain policy, we will suspend or discontinue our relation with such supplier until a corrective action takes place. We are willing, in accordance with our position in the supply chain, to engage with suppliers, to improve and track performance with a view to prevent or mitigate risks. In case we have reasonable belief that a supplier fails to comply with this policy, we will suspend or discontinue the dubious supply.
H. Is your company required to file an annual conflict minerals disclosure? (*)	Yes, with the EU	