

TRANCERIE EMILIANE SPA WITH REGISTERED OFFICE IN STRADA MANARA 22/24 43126 PARMA (PR) ITALY - informs that: on 1st January 2021, a new legislation entered into force throughout the EU, REGULATION (EU) 2017/821 OF THE PARLIAMENT EUROPEAN AND THE COUNCIL establishing supply chain due diligence obligations for metal importers: tin, tantalum, tungsten, gold, originating from areas in conflict or at high risk of conflict.

Conflict Mineral Regulations

- The European regulation 821/2017, which entered into force in 2017, also entails some obligations for importers, which apply starting from January 1, 2021.
- The regulation can be considered the European equivalent of the US law on Conflict Minerals (article 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act), in fact it was created with the aim of preventing the profits from the trade of certain minerals and metals from being used to finance armed groups responsible for conflicts and human rights violations in some countries where mines are present.
- The field of application concerns the four minerals already subject to American legislation (Tin, Tungsten, Tantalum, Gold), including their metals.
- However, the European regulation has important differences, for example regarding "conflict or high risk areas", which the regulation does not list, in order to be able to include any area of the world that corresponds to certain criteria, described in the recommendation 2018- 1149
- In addition, thresholds are defined for quantities imported annually, different for each individual mineral or metal, below which the regulation does not apply.
- The regulation distinguishes between upstream companies (for ex. mines, foundries and refineries) and downstream companies (up to who makes the finished product).
- Importers must implement management in compliance with the 5 steps that the OECD has established in its Guidelines (5 Steps Framework):
 1. establish solid business management systems
 2. identify and assess risks in the supply chain
 3. manage the identified risks
 4. perform an independent audit carried out by third parties to verify the due diligence in the supply chain
 5. elaborate an annual report.

Trancerie Emiliane S.p.A. fully supports this law and its position is to avoid the use of minerals, that are not certified as "conflict free". By reason of the above, Trancerie Emiliane S.p.A. declares that the material supplied by our company DOES NOT CONTAIN metals coming from areas in conflict ("conflict minerals").