



**C.M.R. REGULATION (EU) 2017/Conflict-minerals Regulation OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing due diligence obligations in the supply chain for Union importers of tin and tantalum and tungsten, their minerals and gold from areas of conflict and high risk.**

The European regulation 821/2017, which entered into force in 2017, also entails some obligations for importers, which apply starting from 1<sup>st</sup> January 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 profits coming from the trade of some minerals, and metals from being used to finance the armed groups responsible for conflicts and human rights violations in some countries where there are mines for mineral extraction.

The field of application refers to the four minerals already covered by the American legislation (Tin, Tungsten, Tantalum, Gold) including their metals.

However, the European regulation has important differences, for example regarding the “conflict-affected 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. Furthermore, thresholds of quantities imported annually are defined, different for each individual mineral or metal, below which the regulation does not apply.

The regulation distinguishes between upstream companies (e.g. mines, foundries and refineries) and downstream companies (up to those who make the finished product). The importers must implement a management, that complies with the 5 steps that the OECD has established in its Guidelines (5 steps Framework):

1. Establish solid enterprise management systems
2. Identify and evaluate risks in the supply chain
3. Manage the identified risks
4. Perform an independent third-party audit for the due diligence verification (in particular, companies are asked to adopt responsible behavior in the supply chain)
5. Prepare an annual report

The three main laws in the world governing the sourcing of conflict minerals are: the US Dodd-Frank Act, the European Regulation on Conflict Minerals, and the Chinese Conflict Mineral Standard. They have commonalities as they are all based in part on the OECD Guidelines.

Nevertheless, the scope of the European Conflict Minerals Regulation is much broader than the Dodd-Frank Act as it covers all conflict-affected countries of origin and applies to all companies importing above certain volumes into the EU (see Annex I of the regulation).

Trancerie Emiliane S.p.A fully supports these laws and its position is to avoid the use of minerals that are not certified as “conflict free”.

Due to the above, Trancerie Emiliane S.p.A declares that the material supplied by our company DOES NOT CONTAIN metals from the conflict zones (“conflict-minerals”).

For any details, or clarifications you may need, please contact our company reference, Mr. Di Grandi Vincenzo by mail - > [v.digrandi@trancerieemiliane.it](mailto:v.digrandi@trancerieemiliane.it)

**Parma, 17/05/2023**

**Trancerie Emiliane S.p.A.**

Divisione Motori  
Stabilimento di Parma  
Str. Manara, 22 - 43126 Parma  
Tel. +39 0521 949511 - Fax +39 0521 987376

Sede Legale e Amministrativa  
Str. Manara, 22 - 43126 Parma - Italy  
Tel. +39 0521 949511 - Fax +39 0521 987376  
Capitale Sociale € 3.000.000,00 int. vers.  
Reg. Imprese di Parma N. 00527670343  
VAT N. IT00527670343  
E-mail: [info@trancerieemiliane.it](mailto:info@trancerieemiliane.it)  
[www.trancerieemiliane.it](http://www.trancerieemiliane.it)

Divisione Trasformatori  
Stabilimento di Fornovo Taro  
Str. Val Sporzana, 77 - 43045 Respiccio  
Tel. +39 0525 56227 - Fax +39 0525 56298